Q. PLEASE STATE YOUR NAME, EMPLOYER AND TITLE.

A. My name is Sherry Lichtenberg. I am currently employed by WorldCom, Inc. ("MCI") as Senior Manager, Operational Support Systems Interfaces and Facilities Development.

Q. PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE.

A. I have twenty-two years of experience in the telecommunications industry, fifteen years with AT&T and seven with MCI. I joined MCI in 1996 as a member of the initial team responsible for the development of MCI's local services products, both Unbundled Network Element Platform (hereafter "UNE-P" or UNE Platform") and facilities-based. Prior to joining MCI, I held a number of positions at AT&T, including working in the General Commissions organization, where I developed methods and procedures and billing and ordering systems for use by the Bell Operating Companies and later American Bell. I was Pricing and Proposals Director for AT&T Government Markets, and Executive Assistant to the President and Staff Director for AT&T Government Markets. I also held a number of positions in Product and Project Management. My current role with MCI includes designing, managing, and implementing MCI's local telecommunications services to residential and small business customers on a mass-market basis nationwide. I support both UNE-P product development and our testing and planning for facilities- based competition via Unbundled Network Element loops ("UNE-L") leased from Incumbent Local Exchange Carriers ("ILECs"). I have testified in

numerous proceedings before the FCC and state public service commissions, including multiple state 271 proceedings, network modernization proceedings and a variety of DSL proceedings. In addition, I have worked with the MCI carrier management and contracts teams to negotiate MCI's interconnection agreements with the ILECs.

I. INTRODUCTION

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony in this proceeding is to discuss the state of the industry and to describe for the Commission solutions to the numerous current customer impacting operational impairments that must be eliminated in order for the market to fully make a transition into a facilities-based world. My testimony also explains that if competitors were forced to switch to their own facilities prematurely because unbundled local switching was eliminated, customers and competitors would face severe negative consequences. These consequences also affect consumers currently being served via unbundled loops, because without UNE-P, the volume of loop requests submitted by all competitors would increase dramatically, resulting in a strain on Verizon's already limited resources.

I also discuss why these customer impacting operational impairments are critical in a switching triggers case such as the one filed by Verizon in Rhode Island. To the extent that Verizon has identified carriers who it believes are "trigger" companies, this testimony illustrates why identifying these companies is much more than a simple

counting exercise. The Federal Communications Commission ("FCC") requires that a trigger company be "actively" providing voice service to the mass market and that the carrier must have the ability to serve the mass market "economically and efficiently."[1] If a carrier is only providing service to business customers; catering to a limited portion of the market; providing service to a relatively small number of consumers; or precluded from serving portions of the market, it is questionable whether such a carrier can be described as "actively" serving that market "economically and efficiently." As described in this testimony and in the testimony of MCI witness Earle Jenkins, providing service to the mass market via unbundled loops is very difficult. If a carrier falls into any one of the above categories, it will be impossible to determine if that carrier has overcome the barriers to entry that exist in utilizing UNE-L as a service delivery method for the mass market.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. Verizon is asking the Commission to remove switching as an unbundled network element ("UNE") in various parts of Rhode Island. In practical terms, if the Commission grants that request, it means that UNE-P as we know it today will be provided in only limited areas or will disappear altogether, reducing or withdrawing mass market competition in large portions of the state. In the long term, if MCI is able to move to its own facilities to provide service to mass market customers in a methodical and

[1] Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carrier*, CC Docket No. 01-338, *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket

coordinated manner, elimination of ILEC switching may not have significant consequences for customers, depending on when and where the cutover occurs. However, premature withdrawal of switching before impairments are removed and the appropriate processes and systems are in place will have significant adverse consequences for consumers, carriers and competition.

The Commission must carefully examine the details related to a company's provisioning of UNE-L service to mass-market customers before determining that a company is a trigger company. The Commission must address the operational impairments raised in this testimony to determine whether the alleged triggering companies have overcome the technical and customer impacting issues related to connecting the ILEC's loops to the CLEC's switching facilities to determine if they are actively serving the mass market economically and efficiently.

In this testimony, I discuss some of the operational impairments (and proposed solutions) that exist for an industry that would move to a facilities-based service delivery method for mass market customers. (Other operational impairments relating directly to network and technology challenges are presented in Mr. Jenkin's testimony). The operational issues addressed in my testimony relate to the "customer's experience" as he or she attempts to switch carriers, not just to MCI from the ILEC, but to MCI from other CLECs, and away from MCI to the ILEC or other CLECs. These issues stem from, in one way or another, the physical changes required when a CLEC uses its own facilities in

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No. 96-98, *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147, FCC 03-36 (rel. Aug. 21, 2003) ("*Triennial Review Order*" or "TRO") at ¶495.

conjunction with the ILEC unbundled loop ("UNE-L"), and the difficulty in exchanging information about customers between all carriers in the seamless manner that mass market customers (who tend to switch carriers frequently) have come to expect. Specifically, the impairments that we have identified here (as well as those in the testimony of Mr. Jenkins) must be fully defined and resolved before UNE-L can become a reality for the mass market.

These issues are directly relevant to a triggers analysis because the Commission must determine whether the triggering carriers will be able to continue offering service via unbundled loops if the industry moves to unbundled loops only, and UNE-P is eliminated.[2] Unless these issues are resolved, not only will UNE-P customers be left in the dark in terms of not having competitive alternatives, but UNE-L customers will also be harmed because the processes are simply not in place to handle an entire industry of UNE-L-based competitive providers.

The impairments identifying why a UNE-L-based provider will not be able to continue actively serving the mass market if the Commission prematurely eliminates UNE-P, and therefore forces the entire industry to operate in a UNE-L environment, are summarized below as well as the proposed solutions or first steps recommended by MCI to address these impairments.[3] MCI proposes these first steps in order to demonstrate that the impairments can be overcome, but that there is more work to do for the entire industry.

[2] TRO at ¶500.
[3] It is likely that as carriers move to their own facilities, additional operational issues will arise.

1. *Standard processes and procedures must be developed for obtaining and sharing customer service records ("CSR").*

   MCI proposes that a distributed CSR locator/request system, similar to the CARE Clearinghouse, be developed and shared and maintained by incumbents and competitors alike.

2. *Loop information databases must be accurate and current.*

   MCI proposes that these databases be audited for accuracy and a process be developed to ensure timely maintenance.

3. *Trouble handling processes must be adapted for a mass market world.*

   MCI proposes that all parties develop internal processes (if they do not already exist) to ensure that trouble handling functions properly and quickly in a world with mass market volumes.

3. *The industry must ensure that required E911 changes are sequenced correctly and occur efficiently.*

   MCI proposes that a collaborative be convened to ensure compliance with existing standards as well as coordination among industry participants.

4. *The industry must ensure that number portability processes that are in place are coordinated and can handle mass market volumes.*

   MCI proposes that the Commission convene a collaborative that includes the third party administrator to determine the systems capabilities in a mass

market environment. In addition, MCI proposes that a scalability analysis be conducted to confirm that capability.

5. *The directory listing process must be evaluated for efficiency in a mass market UNE-L environment*.

MCI proposes that a process be developed to limit the number of times the directory information must be inserted and deleted from the directory.

6. *The industry must ensure that the caller name and line information databases can be accessed and loaded with minimal inaccuracy.*

MCI proposes that competitors be allowed to obtain a wholesale product to ensure accuracy and quality service.

For CLECs, these operational barriers impair their ability to use their own facilities effectively to actively serve mass market customers. But even more important, these operational difficulties create frustration and potentially serious problems for consumers, including the inability to make or receive calls, errors in the 911 address data base, and the need to re-program/re-install some programmable features. Although these issues may be manageable today when there are few UNE-L-based providers, such issues could quickly become chaotic when the entire industry is required to use unbundled loops.

In discussing the complex technical issues involved in transitioning carriers from existing UNE-P arrangements to UNE loops connected to CLEC switches, it is easy, sometimes, to forget about the effect of such transition on the customer. Competitive

carriers, like MCI, must place an emphasis on minimizing negative effects on customers who want to transition onto or off of MCI's services. Ultimately, all of this is about people and the kinds of competitive choices that will be available to them.

It is one thing to identify problems that CLECs encounter in a dynamic and rapidly shifting market, but it is another to find solutions to these problems. As part of this proceeding, MCI will be asking for this Commission's help in removing operational barriers and impairments so MCI (and other CLECs) can use their own facilities to interconnect economically and efficiently with Verizon to actively provide service to mass market customers (instead of always having to rely on leasing Verizon's facilities).

II. TRIENNIAL REVIEW ORDER

Q. DID THE FCC'S TRIENNIAL REVIEW ORDER RECOGNIZE THESE OPERATIONAL BARRIERS?

A. Yes. The Triennial Review Order issued by the FCC on August 21, 2003 clearly recognizes that both operational and economic barriers to UNE-L competition exist today. Unlike UNE-P migrations, in which the CLEC uses the same facilities as the ILEC in providing local service, UNE-L migrations are complicated by the necessity of physically reconfiguring facilities so that CLECs can use their own switches. To this end, a physical network change as well as a greater exchange of customer and other information must occur between local providers for UNE-L provisioning as opposed to UNE-P. The FCC made a national finding of "impairment" with respect to unbundled

local switching at the mass market level based on the existence of these operational and economic barriers.

Q. ARE THESE OPERATIONAL IMPAIRMENTS RELEVANT IN A TRIGGERS ANALYSIS?

A. Absolutely. These operational issues must be considered in evaluating the relevant product market as well as in determining whether or not a company can be considered a triggering company that is actively serving the mass market economically and efficiently. Additionally, the Commission must determine whether current UNE-L-based providers will be able to continue serving customers if the entire industry were thrown into disarray by forcing all carriers to use unbundled loops prior to resolving the issues raised in my testimony.

Q. HOW DOES YOUR TESTIMONY ON OPERATIONAL ISSUES TIE IN TO THE TRIGGER ANALYSIS?

A. State commissions must define the market that they are going to analyze in the context of a "triggers" case. Mass market customers must have a real and current choice between three carriers providing local service via their own switches and utilizing the Verizon loop plant within the defined market. As the FCC noted in its discussion of market definition, in conducting their granular analysis, state commissions must take into consideration "competitors' ability to target and serve specific markets economically and efficiently using currently available technologies."[4] To understand that requires the Commission to examine the details to determine if competitors can target and serve the

[4] Id. ¶ 495.

market as defined economically and efficiently. This analysis would require an examination of whether those alleged "triggering" companies have overcome the technical and customer impacting impairments related to connecting the ILEC's loops to the CLEC's switching facilities.

In addition, whether a company identified by Verizon as a triggering company is an active mass market competitor, and whether it will continue to be an active mass market competitor, requires an analysis of technical and operational issues. The FCC notes that the identified competitive switch providers should be actively providing voice service to the mass market.[5] The Commission must delve into the details to determine if suggested triggering companies can be considered to be "actively" serving the market. These determinations require the states to consider the technical and operational impairments that these named companies face in serving the mass market utilizing UNE-L.

If a carrier is not providing unbundled loop-based service to residential customers at all, but is providing service to business customers, that alone says a lot about the fact that the carrier may perceive too many barriers associated with using its switch to serve residential customers, and the market should separate out residential and business customers for the market definition. MCI falls into that category. MCI does not use unbundled loops to serve residential customers. When MCI does order unbundled loops

[5] Id. ¶ 499.

for business customers, MCI is required to have a dedicated team handle any unbundled loop orders for business customers. This obviously is not realistic in a residential setting.

Similarly, as discussed in the testimony of MCI witness Michael Pelcovits, some companies provide only minimal residential service in Rhode Island or in a particular wire center using unbundled loops. Again, this may be specifically because of the impairments mentioned in this testimony.

If a carrier is not actively serving the market, then it cannot be assumed that the CLEC has overcome the operational and technical impairments described in MCI's testimony, and the CLEC should not be counted as a triggering company. Basically, the Commission must address these operational issues to determine whether the alleged "triggering" companies have overcome the technical and customer impacting impairments related to connecting the ILEC's loops to the CLEC's switching facilities to determine if they are active in the market and can economically and efficiently serve the mass market, and to determine whether the CLECs who are currently providing service via unbundled loops will be able to continue providing such service if these issues are not resolved for the entire industry.

Q. THE FCC APPEARED TO FOCUS A GREAT DEAL OF ATTENTION ON THE "HOT CUT" PROCESS.[6] HOW DOES THE HOT CUT PROCESS RELATE TO IMPAIRMENT?

A. Yes, the FCC did focus in great detail on the operational impairments associated with migrating UNE-P customers to UNE-L through the "hot cut" process. The FCC

[6] The Hot Cut process is described more fully in the testimony of MCI witness Earle Jenkins.

focused on this issue because the existing process of moving customers to UNE loops, one or a few at a time, can not handle the volume of UNE loop migrations that would occur if UNE switching were eliminated. Thus, the FCC found that until ILECs develop and implement a process that can handle high volumes, seamlessly and in sizeable "batches," CLECs would not be able to move all of their customers from the existing UNE-P arrangement to UNE loops, and thus CLECs would be impaired in their ability to compete without UNE switching.

Q. WHY ARE HOT CUTS A SOURCE OF IMPAIRMENT IF SWITCHING IS ELIMINATED AS A UNE?

A. The FCC cited as barriers related to hot cuts "the associated non-recurring costs, the potential for disruption of service to the customer, and our conclusion, as demonstrated by our record, that incumbent LECs appear unable to handle the necessary volume of migrations to support competitive switching in the absence of unbundled switching."[7] The FCC explained that because of the manual, labor-intensive nature of the hot cut process, "hot cuts frequently lead to provisioning delays and service outages, and are often priced at rates that prohibit facilities-based competition for the mass market."[8] In other words, the FCC concluded that the existing hot cut process, which can handle only a few loops at a time, could not handle the high volume of loop migrations that would occur if UNE switching were withdrawn, and thus posed an insurmountable barrier to entry using UNE-L.

Q. DID THE FCC DISCUSS THE FATE OF CUSTOMERS IN ITS ORDER?

A. Yes. In addition to discussing the technical aspect of these network and operational issues, the FCC also explained how these issues negatively impact the customer's experience itself. The FCC noted that the delay that accompanies a UNE-L migration prevents competitors from providing service in a way that mass market customers have come to expect.[9] At a basic level, a UNE-L migration (characterized by hot cuts) will always have a potentially more negative effect on a customer than a UNE-P migration, because "[f]rom the time the technician disconnects the subscribers loop until the competitor reestablishes service, the subscriber is without service."[10] Similarly, the UNE-L process of "porting" the customer's number from the CLEC switch to the ILEC switch "also potentially subjects the customer to some period of time where incoming calls will not be received,"[11] because absent proper porting (a task that requires two separate inputs to the national number portability administration data base), calls will not be routed to the customer's new number on the CLEC switch. In addition to these risks, a cut over to UNE-L is not automatic and automated, but depends on an ILEC (or losing CLEC) responding to a winning CLEC (or winning ILEC) request for a change of service, which generally takes several days longer than a UNE-P order. [12]

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[7] *Id.* ¶ 459.
[8] *Id.* ¶ 465.
[9] *Id.* ¶ 466.
[10] *Id.* ¶ 465 n.1409.
[11] *Id.*
[12] For example, a UNE-P migration takes 1 business day in Rhode Island, while migrating the same customer to UNE-L takes at least 5 business days, assuming the ILEC has the ability to schedule the cutover on the requested date.

The FCC explicitly recognized that because "mass market customers generally demand reliable, easy-to-operate service and trouble-free installation,"[13] such disruptions and delays negatively affect customers' perceptions of the CLEC's ability to provide service. Indeed, the FCC found in the *Triennial Review Order* that the record indicated that customers experiencing such difficulties are likely to blame the CLEC, not the ILEC – even if the problem is caused by the ILEC.[14] Moreover, because customers view the ILEC as a baseline alternative to the CLEC for local service, customers' negative perception of a CLEC's service directly hampers a CLEC's ability to win and retain customers.[15]

Q. WHAT WAS THE FCC'S ULTIMATE CONCLUSION?

A. The FCC found that CLECs today are impaired nationally without access to the ILECs unbundled local switching. The FCC recognized that numerous operational impediments make UNE-L for the mass market presently infeasible, or at most, possible only to a limited extent, and then only with great risk of negative effects on customers. Based on the FCC's reasoning, these operational impediments must be identified and adequately resolved before UNE-L can be considered a viable service delivery method for mass markets.

Q. THE FCC ALSO REQUIRES THE STATES TO APPROVE AND IMPLEMENT A "BATCH" HOT CUT PROCESS. WHAT IS THE PURPOSE OF THE "BATCH" HOT CUT PROCESS?

[13] *Id.* ¶ 467
[14] *See id.*
[15] *See id.* ¶ 466.

A. In an effort to alleviate some of the operational impairments to using UNE-L and CLEC switching, the *Triennial Review Order* requires that the states investigate, approve and implement a batch hot cut process ("Transition Batch Hot Cut Process") to "cut over" unbundled loops in high volumes from the ILEC to CLECs.[16] The FCC expected that such a process would enable groups of UNE-P customers to be transitioned to UNE-L simultaneously (in batches), thus "result[ing] in efficiencies associated with performing tasks once for multiple lines that would otherwise have been performed on a line-by-line basis."[17] Yet, although the FCC recognized that such "a seamless, low-cost batch cut process for switching mass market customers from one carrier to another is necessary, at a minimum, for carriers to compete effectively in the mass market,"[18] it did not view this transitioning process as a panacea.[19] Indeed, because this Transition Batch Hot Cut Process only addresses the issue of transitioning to UNE-L the base of customers that competitors like MCI have acquired on UNE-P, it is merely one discrete piece of the much larger puzzle that must be assembled before UNE-L can be seen as a viable service delivery method for the mass market. In practical terms, eliminating the operational impairments associated with the everyday hot cut process ("Mass Market Hot Cut Process") which will be used to move customers to and from multiple carriers in a dynamic competitive market – is far more critical than implementing a Transition Batch

[16] *See, e.g.*, *id.* ¶¶ 487-490.
[17] *Id.* ¶ 489.
[18] *Id.* ¶ 487.
[19] *See, e.g.*, ¶ 423 (describing the batch process as mitigating, not necessarily eliminating impairment).

Hot Cut Process that is only useful for simultaneously moving blocks of UNE-P customers to UNE-L.

Q. WHAT DO YOU SUGGEST THE COMMISSION DO TO ADDRESS THE IMPAIRMENTS ASSOCIATED WITH THE HOT CUT PROCESS?

A. Although states must evaluate and approve a Transition Batch Hot Cut Process, to fully address the barriers to using UNE-L, they must also work toward alleviating the distinct operational impairments associated with subsequent carrier migrations by developing and implementing the Mass Market Hot Cut Process. Although it is likely that the two processes will be similar in some respects, they are not identical. What MCI refers to as the "Transition Batch Hot Cut Process," because it involves the transition of large numbers of customers at once, will necessarily require a number of coordinated steps and scheduling with Verizon, and thus substantial Verizon involvement and oversight. In contrast, the Mass Market Hot Cut Process will need to be a standardized, simple, and low-cost process that can take place on a day-to-day basis. And it will have to function at the same time that the other migration processes are working as well, including migrations to and from retail, UNE-P, and resale, disconnections, suspensions, feature additions and changes. Thus, although a batch hot cut process is critical, it simply will not address the everyday operational impairments that exist in migrating UNE-L customers from CLEC to CLEC, from ILEC to CLEC, and from CLEC to ILEC, in various serving configurations. To address these more fundamental difficulties with UNE-L migrations, the state must streamline the standard Mass Market Hot Cut process (known as the coordinated hot cut process and the frame due time process) as well, so

that it is as effective, efficient, seamless, low cost and as scalable as possible, but without the special scheduling and ILEC handling necessary for the Transition Batch Hot Cut Process. For it is only when day-to-day migrations among all carriers, using all service delivery methods, take place quickly, efficiently and successfully, that a truly competitive market can develop.

Q. THE FCC ALSO REFERS TO THE CONCEPT OF "ROLLING ACCESS" IN ITS ORDER. WHAT IS "ROLLING ACCESS"?

A. In the *Triennial Review Order*, the FCC also raises the possibility of a state commission granting CLECs "rolling access" to mass market switching, if the state commission determines that such access would cure a finding of CLEC impairment.[20] With rolling access, CLECs would have "access to unbundled local circuit switching for a temporary period [at least 90 days], permitting carriers first to acquire customers using unbundled incumbent LEC local circuit switching and later to migrate these customers to the competitive LECs' own switching facilities."[21] In other words, rolling access allows CLECs to use UNE-P to acquire customers at the outset, but then requires that the CLEC transition (i.e., "roll off") those customers to UNE-L within a specified time period after acquisition. The FCC envisioned that this process would enable the CLEC to avoid the delays and disruptions of service that would occur if a CLEC had to acquire the customer via UNE-L at the outset, because the customers are first acquired and then transferred to UNE-L via the Transition Batch Hot Cut Process.

[20] *See id.* ¶¶ 521-524.
[21] *Id.* ¶¶ 521.

Q. WILL ROLLING ACCESS CURE THE OPERATIONAL IMPAIRMENTS FACING A MOVE TO UNE-L?

A. No, rolling access does not ultimately alleviate the operational impairments presented by the everyday Mass Market Hot Cut Process, because it is simply a time-delayed batch hot cut process that focuses solely on transferring UNE-P customers to UNE-L. As discussed above, the Mass Market Hot Cut Process will be essential for all day-to-day ongoing customer transfers. For instance, even if CLECs have rolling access, they will not, unless explicitly required to be included in the process by state commissions, be able to rely on the Transition Batch Hot Cut Process for acquiring and losing customers to other CLECs. Also, CLECs will not be able to rely on the Transition Batch Hot Cut Process if the ILECs have their way, for a number of migration scenarios that are truly necessary to offer customers a choice of a bundled set of services. Therefore, at best, the Transition Batch Hot Cut Process or rolling access could alleviate only some of the operational impairments that exist with respect to the hot cut process. It is critical that state commissions investigate and resolve the substantial operational impairments associated with the Mass Market Hot Cut process as well.

Q. ARE THERE ANY OTHER ISSUES WITH THE CONCEPT OF "ROLLING ACCESS" TO UNBUNDLED SWITCHING?

A. Yes, not only does rolling access not cure the operational impairments involved with utilizing UNE-L to serve the mass market, but it also creates an additional impairment. If a carrier develops a new and innovative product offering using its own switches and other facilities, the customer would not immediately be able to purchase that

product because customers must first have their loop provisioned on UNE-P, which limits the CLEC to providing whatever features the ILEC supports. Customers would be deprived of the product offering until the CLEC could migrate them on a rolling basis to UNE-L. This can create a perception problem – i.e. the CLEC cannot immediately provide the services it is selling. In addition, customers will have to reprogram their customer programmable features such as speed dial and call forwarding after moving from UNE-P to UNE-L, since these features are resident in the serving switch.

III. STATE OF THE TELECOMMUNICATIONS INDUSTRY

Q. WHAT IS HAPPENING IN THE TELECOMMUNICATIONS INDUSTRY TODAY?

A. The telecommunications industry is in a state of flux. It is slowly moving from an industry controlled by large monopolies to an industry with multiple carriers offering multiple services to a dynamic customer base. The trend in the industry is toward bundled services, which allows consumers to select one carrier that meets all of their communications needs.

Q. WHAT IS TODAY'S TYPICAL TELECOMMUNICATIONS CUSTOMER LIKE?

A. In light of the nature of these evolving markets, and the increasing choices available to consumers, today's telecommunications consumer is savvier than consumers of the past. Today's consumer moves frequently between carriers and expects seamless migrations and quality bundled service offerings. The consumer expects that changing local service providers will be as simple and efficient as changing long distance

providers. Consumers want to purchase bundles of services – local voice and long distance, features such as Caller ID, call forwarding and call waiting, broadband, and in some instances wireless and video services as well.

In order to survive and flourish, given these industry conditions, telecommunications providers must be able to meet and exceed these consumer expectations. Providers must be able to provide consumers with seamless and efficient migration between carriers, robust bundled service offerings, and timely repair and maintenance. If a provider is unable to meet the customer's increasingly high expectations, that provider will be pushed out of the market.

Q. DOES MCI SERVE THE MASS MARKET TODAY?

A. Yes. Today, MCI utilizes the UNE-Platform to provide its bundled product (The Neighborhood) to the mass market customers in Rhode Island and elsewhere. MCI does not use UNE-L to serve the residential market today. The UNE-Platform allows MCI to lease end-to-end facilities from Verizon in order to provide service to consumers. Because UNE-P allows competitive providers to enter the market fairly quickly and efficiently on a broad scale, UNE-P has been, and remains, critical in the development of competition in the local exchange market. It is worth noting as regulators attempt to lay the groundwork for carriers to enter the market using their own facilities that is has taken seven years – since the 1996 Telecommunications Act ("Act" or "1996 Act") became law – for UNE-P to become such an efficient service delivery method.

Q. DOES MCI INTEND TO MOVE TO A UNE-L STRATEGY?

A. Yes, where it makes operational and economic sense to do so. The UNE-L service delivery method would allow MCI both to utilize its state of the art network and to promote further innovation of its products and services through further development and deployment of new technology. MCImetro – an MCI CLEC-- installed its first switch in 1995 in Baltimore, MD and grew from there over time. Since 1995, MCI has installed local switches, installed collocations in ILEC central offices and installed fiber rings in major metropolitan areas throughout the country. MCI uses these facilities (along with leased high capacity loop facilities or their equivalent) to provide competitive local exchange service to business customers today.

Q. DOES MCI INTEND TO USE UNE-L EVERYWHERE IT HAS MASS MARKET CUSTOMERS?

A. No. I can't imagine that would happen. For one thing, there are locations where MCI does not have any facilities. Generally, MCI will use UNE-L with its own switches wherever it makes economic and operational sense to do so. It is highly unlikely that UNE-L will make economic and operational sense everywhere in every state.

Q. WHY DO YOU SAY THAT?

A. As the testimony of MCI witness Pelcovits demonstrates, many facilities-based CLECs, to the extent they are still in business, continue to focus mostly, if not solely, on business customers. Business customers not only tend to be more profitable, but they also tend to be concentrated in specific locations and more stable. Other than a very limited exception, the few facilities-based CLECs that are attempting to serve residential customers do so on a small scale and in such a highly manual world that expansion for

them has been slow (at least compared to the expansion MCI has been able to accomplish with the availability of UNE-P in recent years). Cable companies have started offering residential local exchange service, but not on any grand scale yet, and they do not face the same operational challenges as CLECs because they are using their own monopoly cable plant for loops instead of fighting with the ILECs to get access to UNE loops.

Q. ARE THERE OTHER IMPLICATIONS INVOLVING MCI'S MOVE TO A FACILITIES-BASED STRATEGY IN THE MASS MARKET?

A. Yes. In order to utilize UNE-L, MCI's network will need to be "interconnected" with the ILEC network in a much more integrated fashion than ever before. Beyond OSS connectivity, "interconnection" in this sense also means that MCI will be physically connecting its local network to the ILEC local network to get access to the ILEC loops that MCI needs to serve its customers.

Q. WILL MCI'S MOVE TO ITS OWN FACILITIES WHERE IT MAKES ECONOMIC AND OPERATIONAL SENSE HAVE ANY EFFECT ON MASS MARKET CUSTOMERS?

A. Yes, definitely. As noted above, when I talked about MCI's customer base, the move to a facilities-based world is not simply about customers moving from the incumbent monopoly to MCI. Customers will also move from other CLECs to MCI. (Those CLECs may be UNE-L CLECs, or resellers, cable companies, or UNE-P CLECS.) And those same customers will also move away from MCI. Today, customers are won back to the ILEC and they can (and do) go to other CLECs (UNE-L-based CLECs, resellers, cable companies, and UNE-P-based CLECs), but the processes to implement these migrations (particularly among facilities providers and from and to

facilities providers and UNE-P providers) are still in the nascent stage. Most mass markets competition is UNE-P today, but as CLECs move to their own facilities, the "simple" UNE-P migration process will need to be enhanced with processes to allow customers to move among all types of serving arrangements. The point here is that MCI's move to facilities-based competition will not be limited to establishing and maintaining the relationship between MCI and the ILEC; it involves (either now or in the future) the entire industry -- MCI, the ILEC, and every other CLEC offering service in the state.

And in reality, it is more than that. As I will discuss in greater detail later, the move to facilities-based competition will have implications for third parties that provide necessary, but ancillary services, such as the E911 providers and the local number portability provider.

Q. WHAT ARE OTHER CONSIDERATIONS IN THIS ANALYSIS?

A. This testimony talks a lot about systems or processes, but we should never lose sight of the customer. To the extent it is difficult for customers to come to a CLEC for service, or, for that matter, to leave a CLEC, then customers will not be happy and will be more reluctant to switch to a competitive provider in the future. This is bad not just for MCI, but also for the entire competitive market. To the extent customers have bad experiences switching to or from other carriers, those customers may be reluctant to switch to MCI or any other CLEC.

Q. WHAT EXPECTATIONS DO CONSUMERS HAVE TODAY WITH RESPECT TO SWITCHING CARRIERS?

A. Customers expect seamless transitions among carriers like they have experienced in the long-distance industry for years and more recently in the UNE-P world.

Q. HOW DOES THE LONG DISTANCE TRANSITION WORK TODAY?

A. With the ILECs, the entire process takes approximately 12 hours. Thus, because of a standard, automated process, created through 15 years of refinement and cooperation, transitioning between long distance providers is the quick and relatively hassle-free process that customers have come to expect. Indeed, it has taken nearly two decades of constant effort and enhancement of the PIC process for transitions between long distance providers to be as smooth as they are today. This process is not as difficult as moving a customer's local network facilities, which is required by UNE-L.

Q. IS THERE A SIMILAR EXPERIENCE TODAY IN THE LOCAL SERVICE ARENA?

A. Yes, to some extent UNE-P transitions are also relatively seamless to the customer. CLECs and ILECs have worked together over the last seven years – since the passage of the 1996 Act – and this work continues today to develop an automated process for the smooth migration to UNE-P of retail, resale, and CLEC-served UNE-P local voice customers.[22] The migration process is transparent to the customer until it is completed and the new provider's new features and functionalities (*e.g.*, voice mail) appear on his line. There is for the most part no loss of dial tone, no need for coordination between the ILEC and the CLEC, and, most importantly, no manual intervention at the central office distribution frame or other loop interface. Rather, just as in the long distance world, the

CLEC sends a request (usually automated) to the ILEC for the migration of the new CLEC customer and the change is made. As a result of the industry efforts concerning UNE-P, millions of customers have been migrated successfully from the ILEC to UNE-P CLECs, from one UNE-P CLEC to another UNE-P CLEC with relatively little loss of dial tone and no need to coordinate multiple installation and maintenance teams.

Q. HOW LONG DOES THE UNE-P MIGRATION PROCESS GENERALLY TAKE?

A. CLECs and the ILECs have worked together to ensure that the migration of customers from retail to UNE-P and from UNE-P to UNE-P is typically completed within 1 business day (unless the CLEC specifies a later date), regardless of the features ordered. Depending on the rules established with the ILEC, fully automated CLECs, like MCI, can send (and receive) up to 2000 transactions (including migrations, disconnections, and feature changes) per hour, because the process is almost wholly electronic. Most importantly, just like the long distance PIC change, the UNE-P migration process is relatively transparent to the customer and allows customers to change carriers whenever they want to.

Q. IS IT IMPORTANT THAT CUSTOMERS BE ABLE TO CHANGE PROVIDERS RAPIDLY AND SEAMLESSLY?

A. Yes. As noted above, today's consumer changes carriers more frequently than consumers of the past and expects to be able to do so in an efficient and timely manner. In the telecommunications industry, this movement of customers to and from carriers is

[22] It must be noted that it has taken seven years of considerable effort and expense to arrive at a process

commonly referred to as "churn." Churn generally describes the behavior of customers as they move not just from ILEC to CLEC but also from CLEC to ILEC and from CLEC to CLEC. Even in the case of UNE-P, migrations between CLECs today are not seamless, quick or efficient. In most regions, CLEC to CLEC migration processes and procedures are in the nascent stages of being developed and will require extensive work by industry participants to result in viable seamless processes.

Q. IS CHURN A BAD THING OR A GOOD THING?

A. It's really both. Churn is a good thing for consumers, because it allows them to try new products and services from various providers. Such consumer movement encourages carriers to innovate and become more efficient, which in turn, attracts new customers so that carriers are rewarded for innovation and efficiency. In a very real sense, churn is the proof that the competitive process is working. Although good for consumers, churn is problematic for industry players: not only is it expensive when consumers pick a provider for only a short period of time and then leave for another provider, but churn also complicates both the provider's record keeping and billing process that accompany acquiring and losing a customer and those of the underlying network service provider. However, competitors realize that the customer's ability to move amongst providers quickly and efficiently is a necessary and integral part of a competitive telecommunications landscape. Consumers cannot be "locked in" to a single

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that is relatively seamless to the customer and allows for frequent migrations.

provider or "stranded" on a single service delivery platform. They must be able to make choices and migrate among providers at will.

Q. IS THERE A LOT OF CHURN IN THE INDUSTRY TODAY?

A. Yes. Customers are more educated and savvy today and move more frequently among carriers to get better service packages. Churn rates today are fairly high in the telecommunications industry, in both long distance and UNE-P local markets. Customers are switching to and from carriers frequently. These high churn rates have been enabled by regulatory requirements and changes in the OSS of the carriers. Specifically, equal access in the long distance arena, and UNE-P and electronic data interface ("EDI") based order processing in the local service arena, are milestones that have facilitated customer migrations and permitted churn to exist and accelerate.

Q. CAN YOU GIVE A MORE REAL WORLD EXAMPLE OF CHURN IN THE LOCAL MARKET TODAY?

A. Yes. As of October 1, 2003, MCI had ***BEGIN MCI PROPRIETARY ******END MCI PROPRIETARY** residential UNE-P customers in Rhode Island. These customers are distributed over ***BEGIN MCI PROPRIETARY** END MCI **PROPRIETARY** central offices in Verizon's territory in Rhode Island. But that is a very static – and not completely accurate – picture of MCI's customers in Rhode Island. MCI's customers in Rhode Island (and elsewhere) are very dynamic.

MCI adds customers every day and loses customers every day. For example, as of October 1, 2003, we added***BEGIN MCI PROPRIETARY **** END MCI **PROPRIETARY** new UNE-P customers in Verizon territory in Rhode Island. We also

had ***BEGIN MCI PROPRIETARY **** END MCI PROPRIETARY customers leave us for another carrier or to disconnect service. Given those numbers, our churn rate in Rhode Island as of October 1, 2003 was ***BEGIN MCI PROPRIETARY ***% END MCI PROPRIETARY***. While churn means that customers are reaping the benefits of competition, as discussed above, this churn creates significant issues as we move to a UNE-L service delivery mechanism.

Q. IS THERE "CHURN" IN THE UNE-L MARKET TODAY?

A. Not on a significant level. In contrast to the telecommunications markets just described, there is no widespread competition today in the UNE-L market for mass-market customers.

Q. WHY IS THAT?

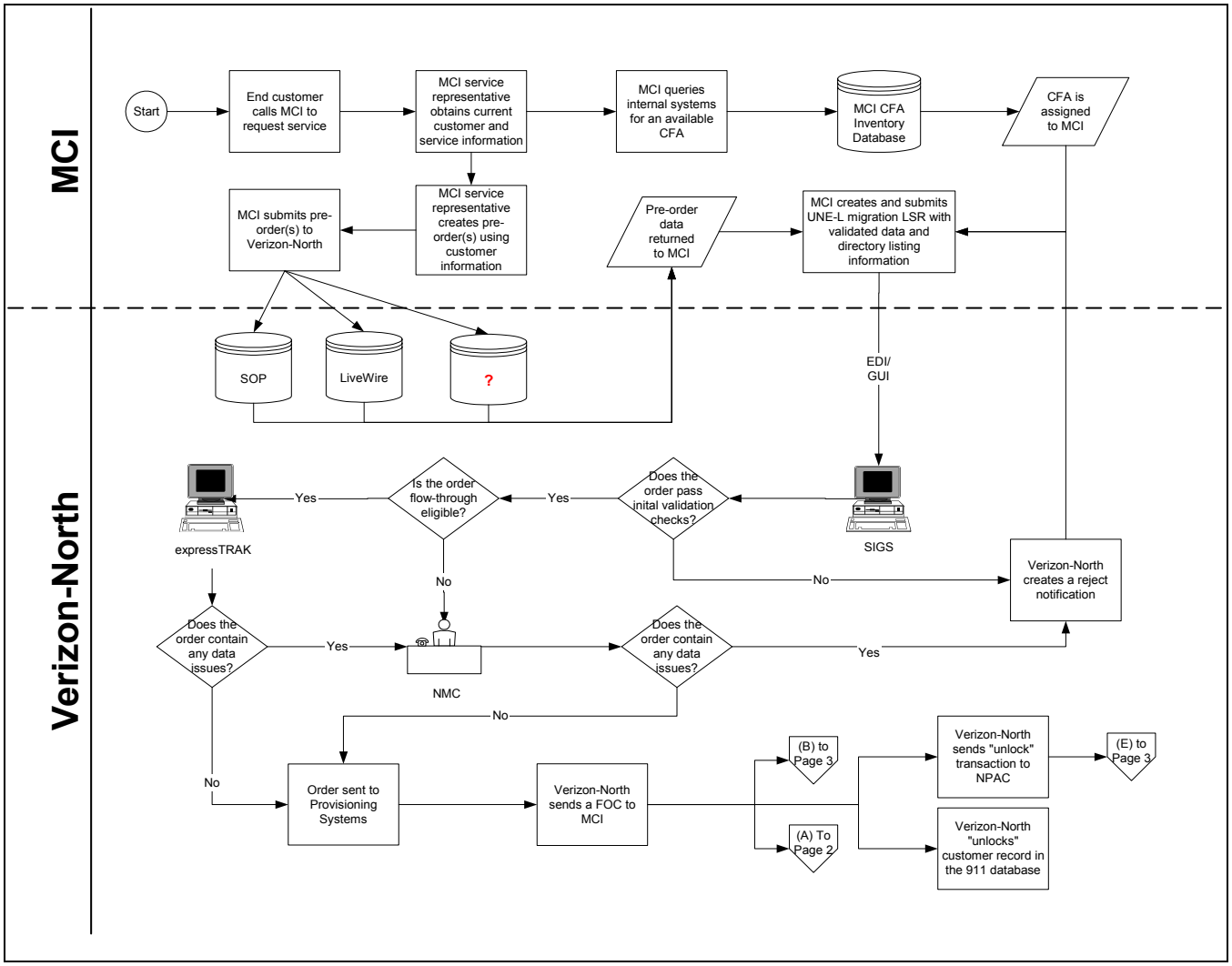
A. First of all, as MCI witness Pelcovits points out in his testimony, there are very few UNE-L providers from which mass market customers can choose, and these providers exist in limited areas and support a limited range of customers. A second, and equally compelling reason for this lack of churn is that a migration to and from the UNE-L service delivery method is anything but simple. In fact, it is really difficult. The systems and processes involved in a UNE-L migration, as opposed to a UNE-P migration, are complex, manually intensive and cumbersome. It is important to remember that it took seven years, from the passage of the Act, to achieve the type of success that has been achieved with UNE-P in the mass-market and UNE-P does not require a physical facility change like UNE-L.

The importance of this issue cannot be overemphasized. UNE-L providers today do not have to worry about transitioning their customers from another UNE-L provider on a mass basis, as would be required if all carriers were forced to move to a UNE-L strategy. Thus, the Commission cannot assume that a UNE-L provider actively serving the mass market today will be able to continue offering that service in the future if these industry operational issues are not resolved before forcing the entire industry to UNE-L.

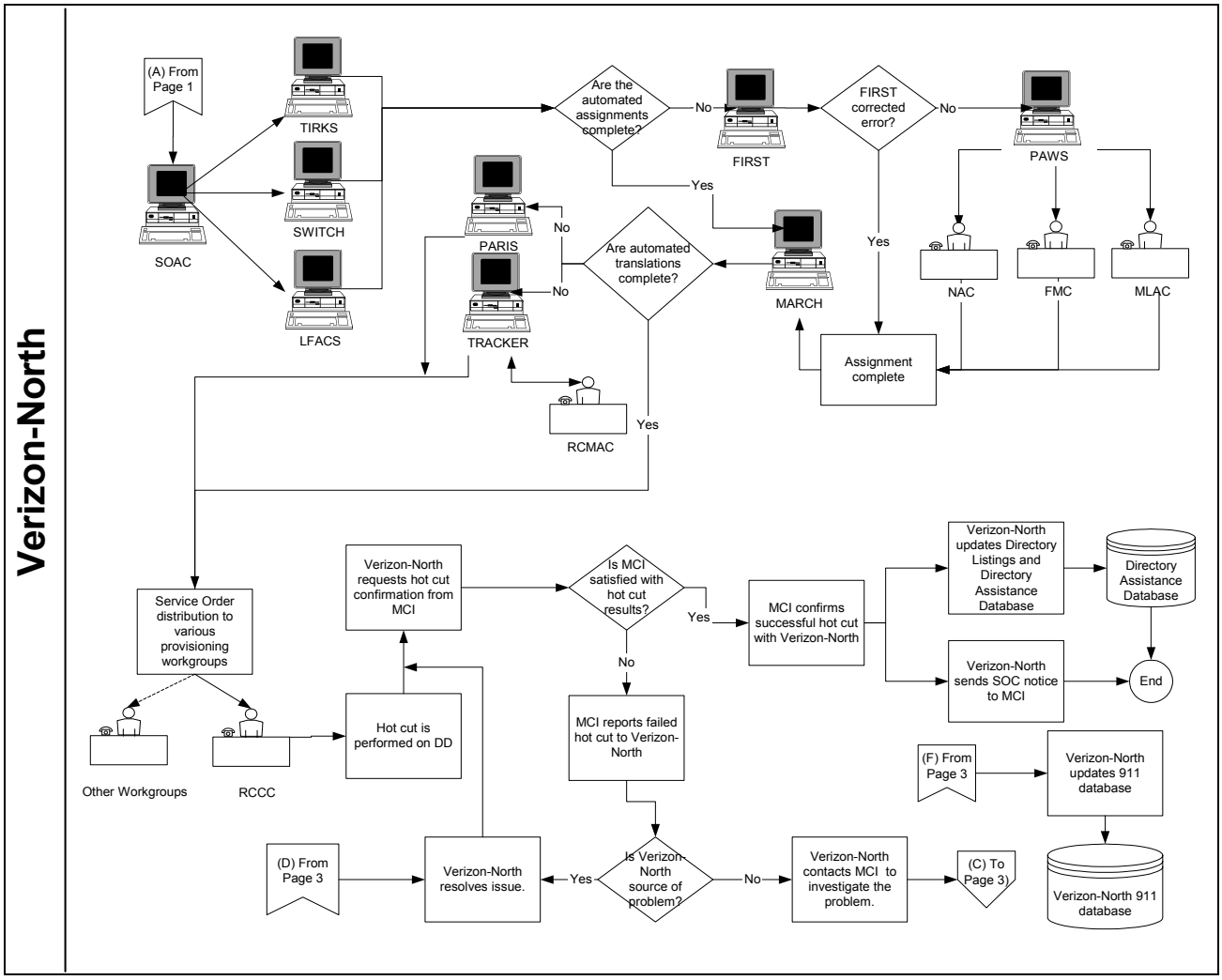
Q. WHAT MAKES THE UNE-L MIGRATION PROCESS SO COMPLEX?

A. Unlike UNE-P, UNE-L requires both a physical change to the facilities involved in providing service to the customer (the loop serving the customer must be physically disconnected from the ILEC/UNE-P facilities and then connected to the UNE-L carrier's facilities in the ILEC central office), [23] as well as an unprecedented exchange of information between the multiple parties involved, including providers not generally involved in the processes reviewed and tested by the Commission. The process flow shown below indicates the pre-ordering, ordering, provisioning, maintenance and repair and billing steps involved in a typical ILEC Retail to CLEC UNE-L migration.

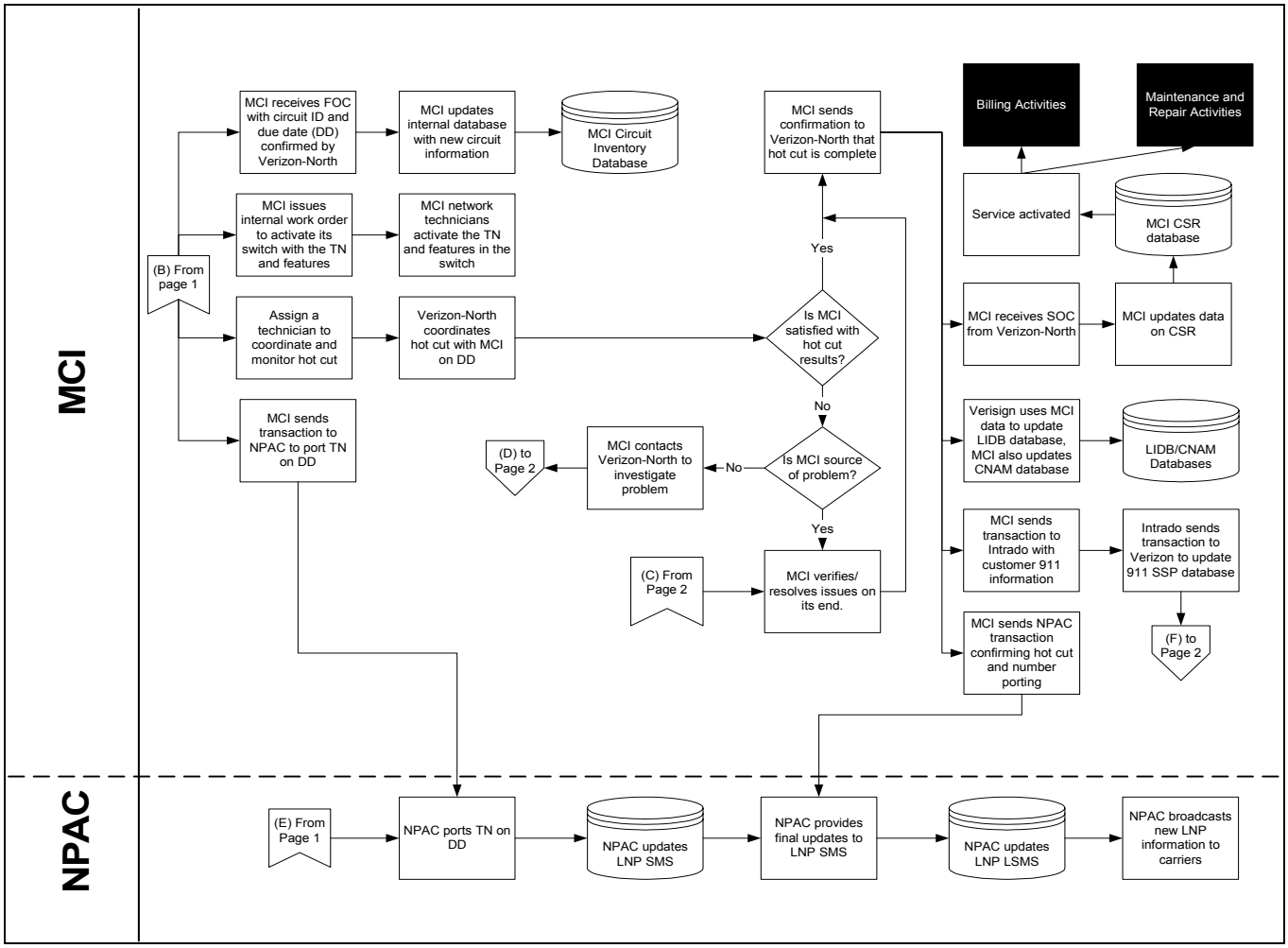
[23] The technical aspects of the hot cut process are discussed in the testimony of MCI witness Earle Jenkins.


MCI
Verizon-North
Start
End customer calls MCI to request service
MCI service representative obtains current customer and service information
MCI queries internal systems for an available CFA
MCI CFA Inventory Database
CFA is assigned to MCI
MCI submits pre-order(s) to Verizon-North
MCI service representative creates pre-order(s) using customer information
Pre-order data returned to MCI
MCI creates and submits UNE-L migration LSR with validated data and directory listing information
SOP
LiveWire
?
EDI/ GUI
expressTRAK
Yes
Is the order flow-through eligible?
Yes
Does the order pass inital validation checks?
SIGS
No
Verizon-North creates a reject notification
Does the order contain any data issues?
Yes
NMC
Does the order contain any data issues?
Yes
No
No
Order sent to Provisioning Systems
Verizon-North sends a FOC to MCI
(B) to Page 3
(A) To Page 2
Verizon-North sends "unlock" transaction to NPAC
Verizon-North "unlocks" customer record in the 911 database
(E) to Page 3

1


Verizon-North
(A) From Page 1
TIRKS
SWITCH
LFACS
SOAC
Are the automated assignments complete?
No
FIRST
FIRST corrected error?
No
PAWS
Yes
PARIS
TRACKER
No
No
Are automated translations complete?
MARCH
Yes
NAC
FMC
MLAC
Assignment complete
RCMAC
Yes
Service Order distribution to various provisioning workgroups
Other Workgroups
RCCC
Hot cut is performed on DD
Verizon-North requests hot cut confirmation from MCI
Is MCI satisfied with hot cut results?
Yes
No
MCI confirms successful hot cut with Verizon-North
MCI reports failed hot cut to Verizon-North
Verizon-North updates Directory Listings and Directory Assistance Database
Directory Assistance Database
Verizon-North sends SOC notice to MCI
End
(F) From Page 3
Verizon-North updates 911 database
Verizon-North 911 database
(D) From Page 3
Verizon-North resolves issue.
Yes
Is Verizon-North source of problem?
No
Verizon-North contacts MCI to investigate the problem.
(C) To Page 3)

1



Q. ARE THERE COMPLEXITIES THAT THIS PROCESS FLOW DOES NOT DIAGRAM?

A. While this process flow can outline the steps in a typical ILEC retail to CLEC UNE-L migration, there are several things that this process flow simply cannot illustrate adequately: 1) at numerous points in this process, manual handling of the UNE-L

migration tasks is required, which can result in errors and delay; 2) UNE-L flow through rates are lower than for UNE-P, causing still more manual work and, hence, more delay and potentially more manually introduced errors (and this problem would only get worse if all CLECs had to use UNE-L); 3) there is a significant amount of information that must be exchanged among various parties to the migration (not just the ILEC and the CLEC or CLECs), and the failure of this information to reach its destination in a timely and accurate manner could significantly affect a customer's service; and 4) the scalability of this process to meet mass market volumes is doubtful and untested (because loops have never been migrated at mass market volumes) at this time. All four of these issues individually or in combination, if left unresolved, are impairments because of the potential to impact customer service and derail a competitor's ability to viably utilize UNE-L to actively serve mass-market customers.

Q. PLEASE EXPLAIN.

A. The process of migrating an ILEC customer to CLEC UNE-L service proceeds as follows:

> The CLEC issues an electronic order to the ILEC requesting that the customer be moved from the ILEC switch to the CLEC switch. Unlike a UNE-P order which requires only the customer's name and telephone number and the features that the customer will be purchasing, the UNE-L order must include the customer's name and telephone number, and information on the collocation cage to which the loop will be transferred and the channel facility assignment (pair) to which the loop will be terminated.
>
> The CLEC will also create internal orders to send to the National Number Portability Assignment Center, the LIDB provider, and the E911 center serving the customer to establish ownership of the customer's number at the appropriate time. These orders must be timed to coordinate with the orders issued by the

ILEC. For example, the ILEC order to unlock the E911 database should be complete prior to the CLEC order to accept responsibility for the record and lock the database. These orders may fall out at any time causing additional customer problems.

The ILEC EDI translation software will accept or reject the order and return a FOC or clarification/reject to the CLEC. The ILEC service order processor may now be able to create the internal orders necessary to migrate the customer to UNE-L. If it cannot, the orders will need to be entered manually by service center personnel. Fallout rates for UNE-L orders are higher than those for UNE-P. If the order does not flow through the system, the ILEC service order personnel will need to type the orders. Unlike a UNE-P migration, multiple related service orders must be created for a UNE-L transition – generally, the local service center personnel must create a Disconnect (D) order to remove the customer from the ILEC switch; a New (N) order to move the loop from the MDF to the CLEC collocation equipment; and a Change (C) order to change the billing to the CLEC from UNE-P to UNE-L. Directory listing orders may also have to be created, as well as a request to unlock the E911 data base to allow the CLEC to "claim" the customer and a "trigger" order to route calls to the customer via the local number portability data base rather than the ILEC switch.

The internal ILEC service orders are routed to the technicians responsible for the UNE-L cutover. These technicians must "find" the customer's circuit at the main distribution frame by manually clipping onto the loop and "listening" for dial tone, wire in a jumper cable which will allow the loop to be extended to the CLEC's collocation equipment, and prepare for the cutover. The frame personnel should also check for dial tone at the CLEC end, ensuring that the CLEC switch will have dial tone for the customer when he/she migrates.

On the day of the cut, the ILEC connects the jumper from the CLEC collocation cage to the frame and notifies the CLEC that the cut has been made.

When the CLEC receives the cut notification, it must complete the local number portability transaction by issuing a "claiming" order to the NPAC. The customer will have dial tone and be able to call out during this process but will be unable to receive calls until the NPAC transaction is completed.

The ILEC will issue a service order completion notification to the CLEC.

The ILEC will complete the internal work required to change the billing to the CLEC from UNE-P (loop and port) to UNE-L (loop only). The customer's CSR will be removed from the ILEC systems.

Q. IS THE UNE-L MIGRATION PROCESS READY FOR MASS MARKET USE?

A. No. If carriers move to a UNE-L service delivery method before the processes and procedures are in place to allow migrations to take place quickly and efficiently, the churn that is a trademark of competition in the long distance and UNE-P markets will create significant problems both for carriers and customers. Without seamless and efficient migration processes in all directions and among all carriers, customer attempts to migrate away from their existing carriers could overwhelm the ability of carriers (both the losing carrier as well as the acquiring carrier) to accommodate that move. The result could be chaos as customers are in effect, held hostage to cumbersome untested processes that cannot support the volume of orders being issued.

In addition, the description and process flow discussed above only outlines the ILEC retail to CLEC UNE-L migration. This migration is only one of 8 core migration scenarios (and the most simple one) that MCI believes it will encounter in a dynamic competitive UNE-L market. One of the remaining seven standard migration scenarios is UNE-P to UNE-L for existing CLEC customers, the migration that the FCC's requirement for a transition batch cut process is intended to address. Other migration process flows are more complex involving CLEC UNE-L to CLEC UNE-L migrations as well as moving customers with DSL service either from the ILEC to the CLEC or between CLECs. MCI has attached the remaining seven core migration process flows to this testimony as Attachments SL-1 to SL-7. Included in these process flows are

numbered points in the process where potential challenges may well exist as well as a glossary of relevant acronyms.

Q. DOES THIS MEAN THAT CLECS WILL ALWAYS BE IMPAIRED AND UNE-L WILL NEVER BE A VIABLE SERVICE DELIVERY METHOD FOR THE MASS MARKET?

A. No. As discussed in more detail below (and in the testimony of MCI witness Earle Jenkins), these issues are not insurmountable, but they must be resolved before CLECs are not impaired and UNE-L can be considered a viable service delivery method for the mass market. Otherwise, not just competitors, but customers will be hurt, and that is not an acceptable outcome. The processes and procedures for migrating to and from UNE-L must be improved and advanced, so that the UNE-L customer experience is as good or better than customers' experiences today in the long distance and UNE-P arenas.

Q. WHAT WOULD HAPPEN IF COMPETITORS WERE REQUIRED TO MOVE TO UNE-L TODAY?

A. There would be chaos. The UNE-L migration process today is manually intensive and cumbersome with multiple points of failure that could result in delay, loss of features, inability to receive calls and worse yet loss of dial tone for the consumer. If the transition to UNE-L is made prematurely, the progress that has been made toward a dynamic, competitive telecommunications market since the passage of the 1996 Act will be erased. Again, this will not just affect UNE-P-based providers, but will also affect current UNE-L-based providers who will no longer enjoy the privilege of being "one of a few" and having access to all of Verizon's UNE-L resources.

Q. SO, IT IS NOT VIABLE FOR MCI TO UTILIZE UNE-L TODAY FOR ITS MASS-MARKET CUSTOMERS?

A. No. Use of UNE-L is not viable today for the mass market because of the significant operational barriers that remain. If competitors were immediately required to utilize UNE-L – with the existing processes and procedures for accessing and installing an unbundled loop – it would be impossible for them to meet customer expectations, and, more likely than not, customers would experience a delay or loss of service when switching carriers. This is simply not acceptable in today's telecommunications environment, in which consumers expect quality service and the ability to move among providers quickly and efficiently. In order for UNE-L to be a viable service delivery method without impairment, it must allow competitors to meet (and exceed) customers' expectations. In particular, migrations between carriers utilizing UNE-L must be seamless and the systems and processes of the entire industry – ILECs, CLECs and third parties – must be fully functional and capable of working together effectively. Today these systems and processes are highly manual and are untested in a mass market environment.

IV. <u>OPERATIONAL IMPAIRMENTS</u>

Q. PLEASE EXPLAIN THE SPECIFIC OPERATIONAL IMPAIRMENTS TO UTILIZING UNE-L THAT EXIST TODAY.

A. There are multiple points where there are changes to customer records and information in both internal and external databases that are required for migration to a

UNE-L service delivery method. Many of these changes result from the fact that the CLEC switch will be utilized in the provision of service with UNE-L versus the ILEC switch that is used with UNE-P. Because there is very little mass market UNE-L competition today, there are a great many unanswered questions surrounding these transfers and information exchanges. These exchanges of information all represent potential points of failure in the UNE-L world that do not exist today with UNE-P. While it appears that they do not represent major technical network impairments that must be overcome, these coordination, database, and ordering issues represent operational impairments that are of critical importance to both the customer and the service provider and until they are resolved, the industry cannot actively serve the mass market with UNE-L.

As noted above, in this testimony MCI is focusing on the customer impacting operational impairments that involve the necessary exchange of information that needs to take place quickly and efficiently in a UNE-L world. The testimony of Mr. Jenkins deals with the more technical operational impairments such as the hot cut itself and the presence of integrated digital loop carrier ("IDLC") in the ILEC's network. Specifically, the customer impacting operational impairments MCI lays out for the Commission involve Customer Service Records ("CSR"), Local Facilities Administration and Control System ("LFACS"), E911, National Number Portability Administration Center ("NPAC"), Line Information Database ("LIDB") and Caller Name Database ("CNAM") and Directory Listing/Directory Assistance ("DL/DA"). All of these customer

record/information changes must take place as efficiently and seamlessly as possible in a UNE-L environment. In addition, MCI will discuss the changes in trouble handling that must take place before CLECs can operate effectively and without impairment in a UNE-L world.

Q. PLEASE EXPLAIN THE CSR ISSUE.

A. Obtaining accurate and complete customer information is essential to a CLEC's ability to submit a valid order. CSRs are used to identify address, feature, directory and other information for migrating customers. CSRs show the most current customer configuration based on the switch port and the current carrier's internal billing systems. During the pre-order phase of a migration, the CLEC representative needs to obtain current customer and service information to create the order. While this information can be retrieved on a real time basis for Verizon retail customers,, the systems and processes required to obtain and share this information have not been developed for all migration scenarios, most notably CLEC-to-CLEC migrations.

Q. IS THIS AN ISSUE FOR INITIAL MIGRATIONS FROM VERIZON?

A. No. This is not an issue in initial migrations from Verizon because the retail CSR is available and customers can be migrated by telephone number and house number, both of which are contained in Verizon's CSRs. CLEC to CLEC migrations for UNE-P customers can also be accomplished by name and telephone, but the winning CLEC must contact the losing CLEC to obtain a CSR in order to determine the customer's features.

This is particularly important for small business customers, since the CSR will show the way in which hunt groups are configured.

Q. IS THIS PROCESS THE SAME WITH ALL MIGRATIONS?

A. No. Obtaining this type of customer information becomes much more difficult in a CLEC UNE-L-to-CLEC UNE-L migration because Verizon no longer has the current customer configuration information. For example, the "winning" CLEC must contact the "losing" CLEC by e-mail, fax, through a web site, or most often, by telephone, to obtain the relevant information. Obtaining information by telephone is not only manually intensive, but is made all the more difficult because there is no complete list of who and when to call. The manual nature of the process means it takes a long time (as opposed to instantaneous transmission for UNE-P) and has a greater margin for error because as yet, there are no CLEC CSR standards for database integrity. To make matters worse, each carrier's CSR looks different and must be interpreted differently, which gives rise to miscommunication.

Q. IS MORE INFORMATION REQUIRED FOR UNE-L MIGRATIONS THAN CLECS CURRENTLY PROVIDE TO EACH OTHER?

A. Yes. Once the customer has migrated to a UNE-L CLEC, additional information is required to effect a subsequent customer move. For example, the carrier to whom the customer is migrating needs the customer's "circuit ID," which will be used by Verizon to track where the customer exists on the main distribution frame of Verizon's switch. The circuit ID generally is not included in the CSR, but rather is passed to the first UNE-L CLEC when Verizon returns a firm order confirmation. The circuit ID is critical, since

the winning CLEC will need that information to ensure that the same physical loop can be used to serve the customer, and Verizon needs the circuit ID to provision the customer's existing loop to the winning CLEC, rather than having to find and provision another loop that its systems show to be available. Because all of the information needed for UNE-L migrations is not readily available – either because Verizon no longer maintains it or the losing CLEC refuses to provide it, or because they are not reliable, comprehensive systems for transferring this information among CLECs – new pre-order processes, including a new method of obtaining CSRs from all industry players, must be developed for UNE-L.

Q. WHAT CSR INFORMATION DOES MCI REQUEST BE INCLUDED?

A. MCI needs the customer's billing telephone number; working telephone number; billing name and address; directory listing information (including listing type); complete service address; current PICs (for both inter and intraLATA, including freeze status); local freeze status, if applicable; all vertical features; options (such as toll blocking and remote call forwarding); tracking or transaction number; service configuration information (*i.e.*, whether customer is served via resale, UNE-P, UNE-L, etc.); the identification of the network service provider, and the identification of any line sharing or line splitting on the line; the Verizon feature name and USOC for vertical features and blocking options to ensure that CLECs can understand each other's CSRs; circuit ID information; and identification of line sharing/line splitting providers. Currently, some CLECs are not providing any CSR information, while in other cases the information is

provided slowly. Some CLECs that provide CSR information do not include all the customer's features or the customer's circuit ID, or do not provide an accurate circuit ID.

Q. DO THESE CSR ISSUES AFFECT A CUSTOMER'S ABILITY TO MIGRATE BETWEEN UNE-L CLECS?

A. Yes. This CSR issue must be addressed and the infrastructure developed prior to the implementation of UNE-L. Otherwise, customers will be stuck where they land in their first migration or Verizon will be forced to install more and more facilities to compensate for the inability to identify the current circuit being used.

Q. DOES MCI HAVE A PROPOSAL TO RESOLVE THESE CSR ISSUES?

A. Yes. MCI proposes the establishment of a distributed CSR locator/retrieval system, similar to the CARE Clearinghouse used in long distance, which would be used by CLECs and Verizon alike to route requests for CSR information to the customer's current carrier. The ability to obtain a CSR, including circuit ID information, from all CLECs will be necessary before UNE-L migrations can be handled on the same basis as UNE-P migrations.

Q. PLEASE EXPLAIN THE CLEARINGHOUSE CONCEPT IN MORE DETAIL.

A. MCI recommends that a central clearinghouse be established to identify the owner of a particular customer and to forward queries to the current provider to retrieve that customer's service information**.** The Clearinghouse would serve as a hub for CSR requests, directing them to the proper providers following a single data communications

protocol for those CLECs that develop a systems approach or via manual means for those that do not. CLECs would maintain CSRs in a standard format and would agree to standard delivery methods and time frames. CLECs could also establish direct communications between each other if the volume of requests warranted it. Companies that did not want to maintain their own CSRs or could not develop the software necessary to electronically transmit that information to the clearinghouse could contract with third party vendors (or even Verizon) to support this process. State commissions would need to develop standards and procedures to ensure that information was exchanged within the appropriate time frames.

Q. ARE THERE OTHER DATABASE ISSUES?

A. Yes, work is required on all the databases utilized to configure and provide UNE-L to mass markets customers, including LFACS, E-911, LIDB, CNAM, DA/DL, and potentially others.

Q. WHAT IS THE PROBLEM WITH LFACS?

A. In the pre-order phase, MCI may submit a loop qualification inquiry (to LFACS) to determine loop make-up information. The accuracy of the data is critical to the CLEC's ability to determine if it can serve the customer. For example, the CLEC needs to know if the customer's loop is all-copper (and can be unbundled) or is served through an integrated digital loop carrier ("IDLC") system, which the ILECs claim cannot be unbundled, or whether the customer has fiber to the home. The ILECs require that loops served by IDLC be handled separately and will not unbundle fiber to the home.

Q. IS THE DATA CONTAINED IN LFACS ACCURATE?

A. At this point, we truly don't know. There has been evidence in other proceedings (various 271 proceedings as well as the Virginia arbitration proceeding at the FCC) that LFACS does not contain accurate data. Given the current low level of UNE-L and DSL competition, it is difficult to know how inaccurate that data is, despite minimal testing done during the 271 process.

Q. HOW DOES MCI PROPOSE TO RESOLVE THIS ISSUE?

A. MCI proposes that LFACS be audited for accuracy and a process developed to ensure that it is accurately maintained (real time) when the ILEC alters or changes its loop plant. This is particularly important as ILECs take down their copper plant and replace it with fiber. In addition, CLECs must be able to "reserve" a spare copper facility when a customer is migrating to ensure that that migration can take place. Currently, while LFACS will allow a CLEC to determine whether there is spare copper to support the unbundling of the customer's service, that copper loop may be "taken" by another CLEC or the ILEC itself to serve another customer in the process of migrating or changing his loop to allow the provision of data services.

Q. IS CUSTOMER TROUBLE HANDLING DIFFERENT IN A UNE-L VERSUS A UNE-P WORLD?

A. Yes. Since UNE-P is provided by combining existing elements of the Verizon network, customer network issues can be resolved in the same way for a UNE-P customer as they are for a Verizon retail customer. The CLEC uses the Verizon Mechanized Loop Test (MLT) to identify the trouble and dispatch the required repair

personnel. When a customer moves to UNE-L, his service is provided as three separate components – the Verizon loop, the CLEC collocation equipment, and the CLEC switch. CLECs will need to isolate the trouble to the company responsible for its repair and then dispatch two separate repair forces (CLEC resources to repair their switches and collocation equipment and Verizon forces to repair the loop or NID) before the customer's service can be restored. This will take additional time that may impact customer service.

In a UNE-L environment, MCI representatives gather the appropriate information from the customer and make an initial trouble assessment. To do this, MCI must "sectionalize" the trouble and determine whether a dispatch to the MCI switch, a dispatch to the MCI collocation, a dispatch to the Verizon MDF, or a dispatch out to the field is required. If the problem is in MCI's portion of the network, MCI either must dispatch a technician to its collocation cage or work with Verizon to clear the problem. If no trouble is found on MCI's network, typically MCI will request Verizon to determine if the problem is with Verizon's network. If no trouble is found after a "dispatch in" to Verizon, the initial ticket may be closed and MCI may have to open a new ticket if it turns out the problem lies at the MDF or the facility running from the frame to MCI's collocation space. This process thus can lead to increased out of service times and harm customers by putting them in the middle of "finger pointing" exercises.

Q. WHY IS THIS AN ISSUE?

A. Since few mass markets customers today have UNE-L service, this trouble handling process has not yet been adapted for a world where customer service outages must be repaired rapidly so that residential customers can continue to be able to receive dial tone.

Q. HOW DOES MCI PROPOSE TO HANDLE THIS ISSUE?

A. For trouble handling in a UNE-L environment to work properly, CLECs like MCI need to obtain newer and more advanced test equipment as well as to develop internal processes to address this trouble handling and the anticipated volumes. In addition, all parties need to make sure that the dispatch rules surrounding trouble handling are adequate, function properly and are scaled to mass market volumes. These kinds of issues lend themselves to a workshop process under Commission supervision, along the lines I already have discussed.

Q. ARE THERE CHANGES INVOLVING A CUSTOMER'S E911 INFORMATION?

A. Yes. When a consumer migrates from the ILEC (or another CLEC) to MCI, the 911 database must be updated to reflect the new switching provider. This change occurs shortly after the loop is cutover to the CLEC and requires the ILEC to "unlock" the E911 database. This allows the CLEC record to overlay the existing ILEC record with updated information, including the CLEC company code and 7x24 emergency number as well as the current customer address information (if necessary).

Q. WHAT HAPPENS IF THE CHANGE IS NOT MADE CORRECTLY?

A. If this change is not made correctly, the customer's E911 information in the Automatic Line Identification ("ALI") database will not include the CLEC's company ID or the customer's correct address if the customer has moved or the record required some other correction. It is essential that this change to E911 be done correctly and also that it be seamless and transparent to the migrating consumer.

Q. IS THIS CHANGE REQUIRED IN A UNE-P WORLD?

A. No such change is required in a UNE-P world where the ILEC retains control over the 911-database information for the UNE-P CLEC.

Q. COULD YOU EXPLAIN THE NECESSARY E911 CHANGE IN MORE DETAIL?

A. Specifically, in a UNE-L environment there are two orders required for changes to the 911 ALI database.[24] One order must go from the ILEC to the 911 provider to unlock the record in the ALI database. This allows the CLEC to overlay the existing record with the updated 911 ALI record, once the migration has been successfully processed.

The second order must go through the CLEC's vendor (or the ILEC if the CLEC has contracted with them) to overlay the existing 911 record with the new record. It is essential that these orders are coordinated so that the ILEC unlock order arrives before the CLEC "Migrate" order to newly populate the database.

[24] The ILEC in most cases maintains the 911 Selective Router used for routing a 911 call to the appropriate PSAP. The PSAP dips into the ALI database when a 911 call is received to retrieve the address of the caller. The PSAP is the custodian of the data required to dispatch emergency personnel. The PSAP must have a record for each customer a facilities CLEC owns and must be able to contact that carrier.

A critical issue here is the timing of the "unlock" order. In MCI's experience in providing UNE-L to business customers, we have discovered that many ILECs do not send the "unlock" order until the CLEC's migration order has actually closed in the ILEC billing system. Since this will necessarily be sometime **after** the physical completion of the order, there could be a time lag where the 911 system has incorrect information on the network service provider. The National Network Numbering Association ("NENA") standard is to send the 911 order at the time of port. MCI follows that standard. This discrepancy between the ILEC and CLEC processes could lead to major problems regarding the accuracy of the 911 database and the ability of CLECs to provide current information to update the database. The ILEC systems should be revised so as to send the 911 record at the time of porting. This change would greatly improve the timeliness of the 911 record process and further ensure that accurate customer information is in the 911 database.

Q. WHAT HAPPENS IF THE ORDERS ARE NOT SEQUENCED CORRECTLY?

A. If the sequence of the orders is disrupted, the 911 database cannot be updated. While the customer will be able to dial 911, the Public Safety Answering Position ("PSAP") will only see the old customer record, which may or may not be accurate and will contain the wrong company ID for correction or trap and trace requests. As the number of UNE-L orders increases and particularly during the bulk transition of customers from UNE-P to UNE-L, the problem will become more severe. Most

importantly, the CLEC will be required to manually check the ALI database information to determine if the update has been accepted and has passed the myriad of required edits.

Q. DOES MCI HAVE A SUGGESTION ON HOW TO FIX THIS IMPAIRMENT ISSUE?

A. Yes. Aside from requiring the ILECs to comport with the NENA guidelines as discussed above, these critical 911 orders must be coordinated through the various systems and processes of all industry players in order to ensure that migration to UNE-L does not result in E911 problems. MCI suggests that the states convene some type of collaborative to ensure that the orders are coordinated. Today, these 911 changes take place for a limited number of consumers because UNE-L is not used predominantly in the mass market. However, if UNE-L were to become a viable mass-market service delivery method, it would be essential to ensure that the 911 changes required with such a migration are accurate as well as seamless and transparent to the consumer. In addition, CLECs, state commissions, and the PSAPs need to work together to ensure that the PSAP database can handle the increased volume of unlock and lock requests issued in a UNE-L environment.

Q. ARE THERE ISSUES INVOLVING NPAC IN A UNE-L MIGRATION?

A. Yes. The National Number Portability Administration Center handles the database updates necessary to determine the "home switch" for each UNE-L (and cable) customer -- i.e. the switch that customer is associated with.

Q. ARE NPAC CHANGES NECESSARY WITH UNE-P?

A. No. Since UNE-P utilizes ILEC switching, there is no need to send transactions for UNE-P migrations to the NPAC, keeping the number administration task to a manageable level. When CLECs move to UNE-L, however, this becomes a necessary and integral part of the process – and one that is currently untested at mass-market volumes.

Q. PLEASE EXPLAIN.

A. When a customer migrates to UNE-L, a transaction must be sent to NPAC to identify the "destination" switch for calls to this number. The ILEC initiates this transaction by creating a "10 digit trigger" in the donor (losing) switch at the time the UNE-L order is created. The trigger will cause incoming calls to "dip" into the NPAC database to determine the switch that now houses the number. The CLEC initiates the second step of this process when it receives notification from the ILEC that the cut has been completed. The CLEC then sends a transaction to NPAC to claim the number. Until the CLEC claims the number in the NPAC database, the customer will be unable to receive any incoming telephone calls. If the NPAC transaction is not completed successfully, (for example, the NPAC system is down, the request is formatted incorrectly, or the ILEC has not notified the CLEC that the cut is complete) the customer will not be able to receive calls, since they will be directed to the incorrect home switch.[25] It is essential that the NPAC process be coordinated and successful. If it is not, consumers could experience service problems that simply do not exist today with UNE-P,

[25] The customer's voice mail will also be impacted.

and these problems may occur on a switch-by-switch basis, causing some calls to complete to the UNE-L customer but not others. The current experience of customers trying to port their number between wireless carriers provides a good example of the problems that are occurring in the local number portability process. The number portability problems are causing many customers to carry two telephones, one from their new provider and one from their old provider, to ensure that they will continue to receive calls. While this is merely inconvenient to wireless customers (and perhaps more expensive than necessary – subscribing to two different wireless carriers at the same time) customers can still receive calls directed to their number. With wireline local number portability, customers would likely be livid if the process does not work properly as the customers would have no work-around to receive calls until the number is properly ported over to the carrier providing dial tone via a UNE-Loop to the residence.

When the customer changes carriers again, the losing carrier must "unlock" the existing record to allow the winning carrier to "replace" it with its destination code. Both churn and the addition of wireless local number portability (the ability for customers to migrate their numbers between wireless carriers and from wireline to wireless carriers) will raise the number of transactions processed by the NPAC tremendously. It is unclear whether or not NPAC will be able to handle the volumes of transactions that would occur in a dynamic UNE-L market. If they cannot handle the volumes, changes to the NPAC process will undoubtedly prove necessary.

Q. DOES MCI HAVE ANY SUGGESTED RESOLUTION TO THIS ISSUE?

A. MCI recommends that the Commission immediately open a collaborative discussion between Verizon, CLECs, and the current NPAC administrator, Neustar, to determine NPAC's actual capabilities and to develop metrics for the completion of number portability tasks. While NPAC has a forecasting process that determines projected volumes on a yearly basis, this process does not currently include the majority of CLECs and therefore has not been updated to include the volumes that would occur with the transition to UNE-L. Volume testing or scalability analysis will also be required to determine whether NPAC can actually handle the volumes of numbers that will be ported in a single day. Since a failure of the NPAC system will have a direct negative impact on customers, it is critical that the movement to UNE-L for mass markets customers not take place until all parties are clear that the system can support the increased volumes.[26]

Q. ARE THERE ISSUES WITH DIRECTORY LISTING AND DIRECTORY ASSISTANCE?

A. Yes. In a UNE-L world, CLECs must send directory listing information to the ILEC to include in both the printed and on-line directories of each company. This step occurs as part of the UNE-L migration order.

Q. ARE CHANGES TO DL/DA NECESSARY WITH UNE-P?

A. No. No changes are necessary in a migration to UNE-P.

Q. HOW DOES THE DIRECTORY LISTING PROCESS WORK WITH UNE-L?

[26] Neustar has told both ILEC and CLEC representatives that it can handle "any volumes," but these are marketing rather than technical analyses.

A. The CLEC completes the directory listing form and sends it with its order to the ILEC for processing. While an "as is" (i.e., no change) directory listing can be ordered from the ILEC as part of the "first" retail to UNE-L migration (or UNE-P to UNE-L conversion), this process must be repeated with full information for each subsequent change. This increases the likelihood of errors or deletions in the directory as it is "opened" to remove listings and "closed" to put the same listings back in. This was an issue raised in the state 271 proceedings by UNE-L carriers who had evidence of directory listings being left out of the phone books, inserted into the incorrect locations in the phone books or containing incorrect customer information. Again, the sheer volume of directory changes to be processed if UNE-L were to become a viable mass-market service delivery method could have significant impacts on the directory publishing and operator services databases.

Q. DOES MCI HAVE A PROPOSED RESOLUTION TO THIS ISSUE?

A. MCI recommends that "migrate as is" functionality for directory listings be available to CLEC-to-CLEC migrations as well as in ILEC-to-CLEC migrations to limit the number of times that this information must be added and deleted.

Q. ARE THERE ISSUES WITH LIDB AND CNAM?

A. Yes. The LIDB and CNAM databases provide information on caller identity and blocking options. UNE-P customers today use the LIDB and CNAM databases provided by the ILEC, so that unless a CLEC customer chooses new blocking options when he or she migrates, no changes are required to his or her LIDB and CNAM information. When

a customer migrates a telephone number to a facilities-based carrier, however, the losing company deletes the customer's information from the LIDB and CNAM databases and the acquiring carrier loads that information.

LIDB and CNAM are essential databases. Customer information for migrating customers whose LIDB and CNAM information is not loaded on time or is incorrect will have blank or incorrect calling name displays for caller ID or will have blocking options loaded incorrectly. This could lead to calls being blocked by the called party due to missing information or to the improper rejection of third party billed calls.

Q. WHY IS MCI CONCERNED ABOUT CNAM PROBLEMS?

A. CLECs either must create CNAM data from published sources (which can result in a substandard database) or dip the ILEC systems to receive the data at a per dip rate. The CNAM database stores the information used to provide caller ID information. If this information is not provided, calls from CLEC customers to customers with features like anonymous call rejection cannot be completed; that is, the "anonymous call" will be rejected. Because UNE-L CLECs will have to develop their own CNAM databases from published sources (or pay the higher charge for a non-TELRIC priced database dip), this information will not necessarily mirror that provided when the customer was served by UNE-P, causing customer confusion, increased trouble calls, and potentially leading the customer to return to the ILEC.

Q. CAN YOU GIVE US AN EXAMPLE OF THIS PROBLEM?

A. Certainly. If a customer has a "non-published" but "listed" number, that

number will not appear in the phone book but will be available via caller ID. When MCI or another CLEC that relies on its own databases migrates this customer to UNE-L, this information will change, since the CLEC will have only the published source (the directory) from which to create the CNAM record. After the customer is moved to UNE-L, calls from his telephone to other customers will not display CNAM information and his calls may be rejected as "anonymous."

Q. DOES MCI HAVE A SOLUTION TO THIS PROBLEM?

A. Yes. MCI recommends that the ILEC create a wholesale CNAM information product at a just and reasonable rate. This product would allow CLECs to obtain a download of the ILECs' databases when using UNE-L to ensure that there is consistency of information and that callers are provided with the fully functional features that they require. In addition, all of the parties, both vendors and the ILEC, need to examine the increase in LIDB and CNAM data volumes that they will have to handle to determine whether existing processes are sufficient. In addition, current processes for error checking and reject handling must be followed or new processes developed -- issues that were never addressed with UNE-P because the ILEC systems were used.

Q. DOES MCI BELIEVE THAT ALL OF THESE CUSTOMER-IMPACTING ISSUES WOULD HAVE A SIGNIFICANT EFFECT ON CUSTOMERS IN A UNE-L WORLD?

A. Yes. All of these customer record/information changes must take place as efficiently and seamlessly as possible in a UNE-L environment. It is critical that these various orders and transfers of information be coordinated to the greatest extent possible

throughout the various systems and processes of each provider, and between providers. A lack of coordination could result in errors in the customer records, the loss of customer data and loss of dial tone. Thus, these issues represent a major source of impairment until they are resolved.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. In conducting this proceeding, the Commission must carefully examine the details related to a company's provisioning of UNE-L service to mass market customers before determining that a company is a trigger company. The Commission must address the operational impairments raised in this testimony to determine whether the alleged triggering companies have overcome these issues related to connecting the ILEC's loops to the CLEC's switching facilities to determine if they are actively serving the mass market economically and efficiently. The Commission must also determine whether a CLEC currently providing service via unbundled loops will be able to continue providing such service if all competitive carriers are forced to use unbundled loops without first resolving the issues raised in this testimony.

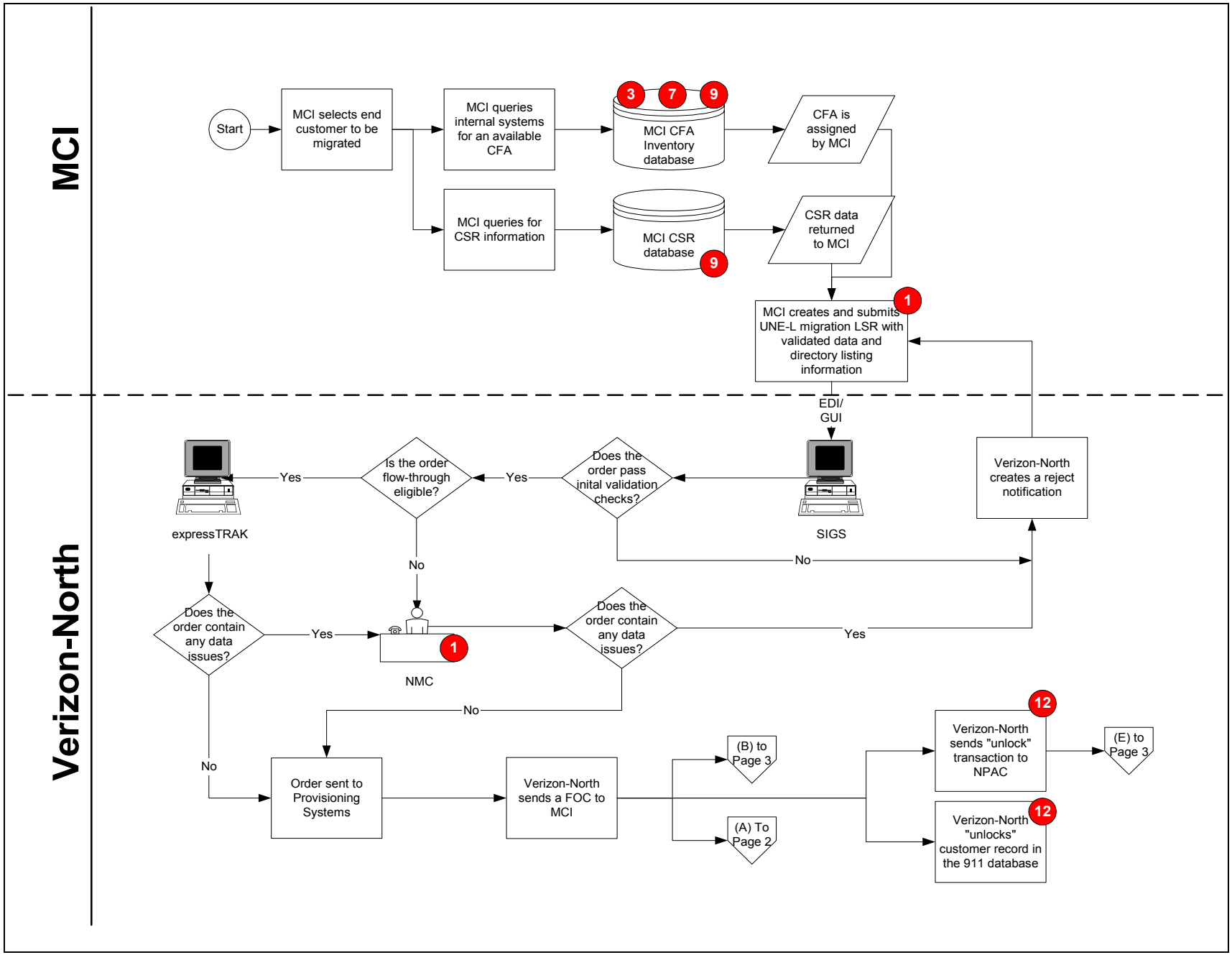
It is critical to the success of the dynamic, competitive local exchange market that all of the industry players participate in the resolution of these customer-impacting operational impairments. The goal of this proceeding must be to ensure that the correct processes and systems are in place to allow consumers to move quickly and seamlessly among carriers in a dynamic competitive market that includes UNE-L as a service delivery method. Only then will we achieve the goal of making sure that consumers have

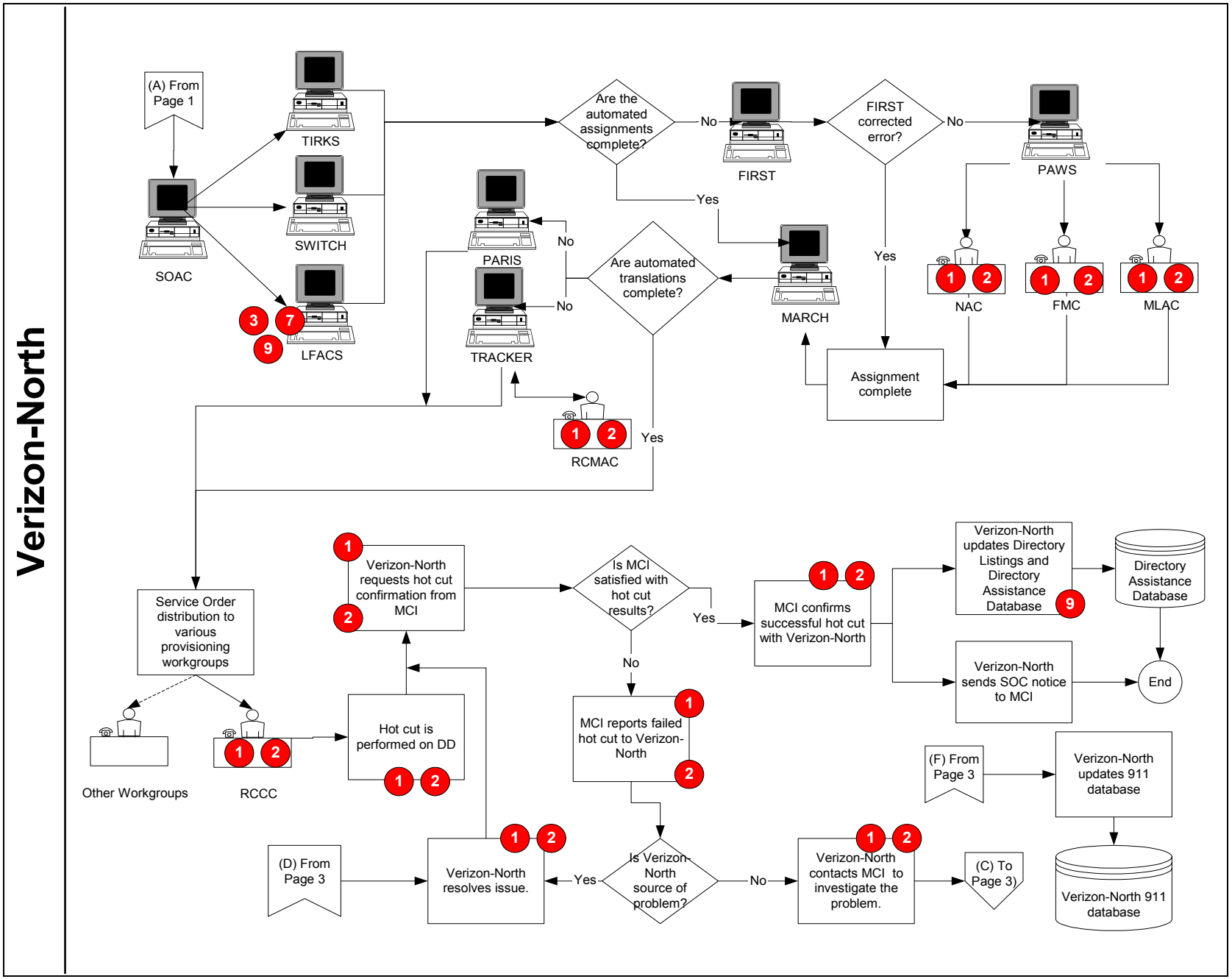
real viable service and provider choices available to them.

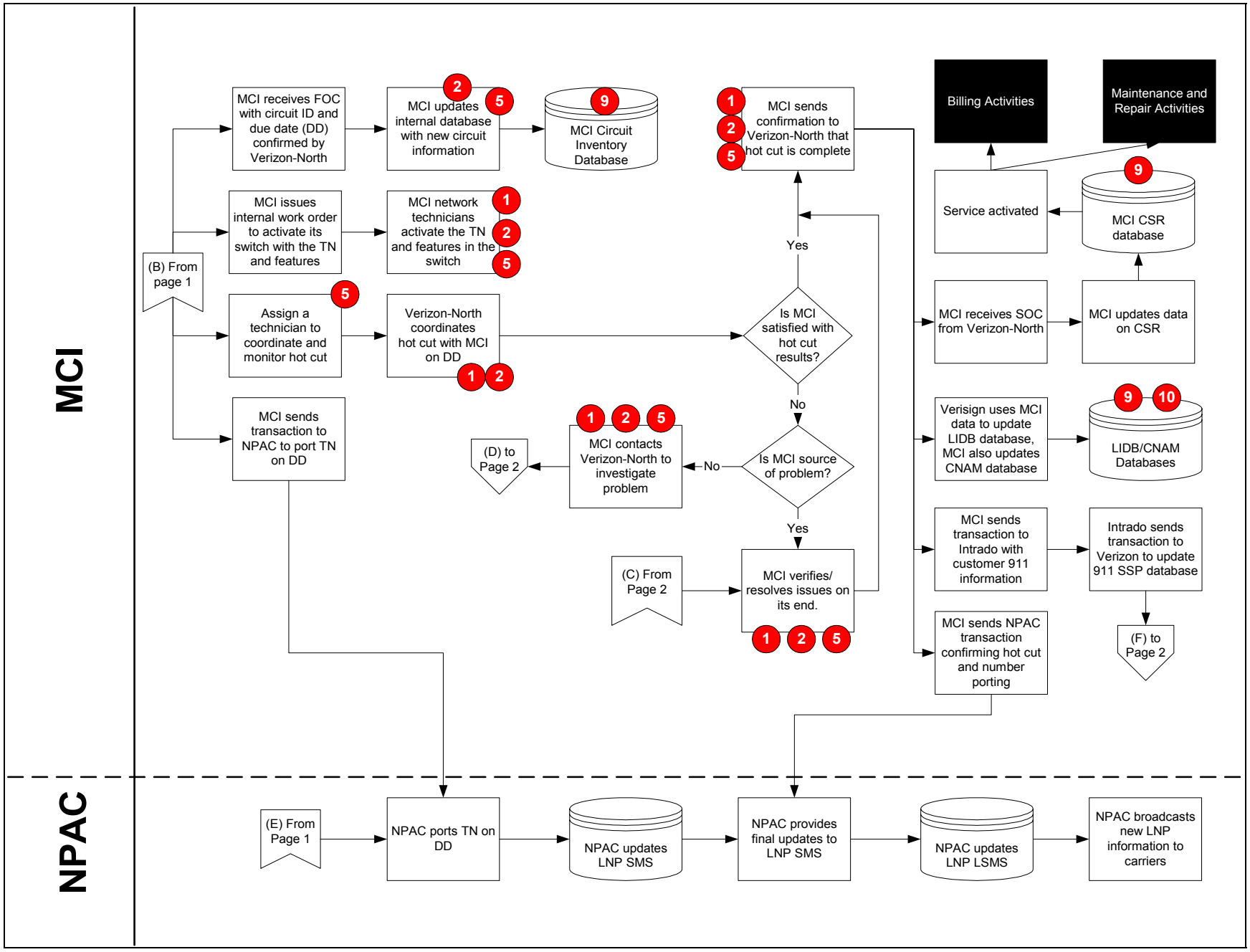
Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

Exhibit SL-1	MCI UNE-P to MCI UNE-L Conversion (Individual Customer)
Exhibit SL-2	CLEC UNE-P to MCI UNE-L Migration
Exhibit SL-3	CLEC UNE-L to MCI UNE-L Migration (Verizon-North)
Exhibit SL-4	Winback - MCI UNE-L to Verizon Retail Migration
Exhibit SL-5	Verizon Retail DSL-Capable Loop to MCI DSL-Capable Loop Migration
Exhibit SL-6	Line-Splitting UNE-P CLEC to MCI UNE-L (Voice and Data) Migration
Exhibit SL-7	CLEC DSL-Capable Loop to MCI DSL-Capable Loop


MCI
Verizon-North
Start
MCI selects end customer to be migrated
MCI queries internal systems for an available CFA
MCI queries for CSR information
3
7
9
MCI CFA Inventory database
MCI CSR database
9
CFA is assigned by MCI
CSR data returned to MCI
1
MCI creates and submits UNE-L migration LSR with validated data and directory listing information
EDI/ GUI
expressTRAK
SIGS
Yes
Is the order flow-through eligible?
Yes
Does the order pass inital validation checks?
No
Verizon-North creates a reject notification
No
Does the order contain any data issues?
Yes
1
NMC
Does the order contain any data issues?
Yes
No
No
Order sent to Provisioning Systems
Verizon-North sends a FOC to MCI
(B) to Page 3
(A) To Page 2
12
Verizon-North sends "unlock" transaction to NPAC
(E) to Page 3
12
Verizon-North "unlocks" customer record in the 911 database


Verizon-North
(A) From Page 1
SOAC
TIRKS
SWITCH
LFACS
Are the automated assignments complete?
No
FIRST
FIRST corrected error?
No
PAWS
Yes
PARIS
TRACKER
No
No
Are automated translations complete?
MARCH
Yes
NAC
FMC
MLAC
Assignment complete
RCMAC
Yes
Service Order distribution to various provisioning workgroups
Verizon-North requests hot cut confirmation from MCI
Is MCI satisfied with hot cut results?
Yes
MCI confirms successful hot cut with Verizon-North
Verizon-North updates Directory Listings and Directory Assistance Database
Directory Assistance Database
Verizon-North sends SOC notice to MCI
End
No
MCI reports failed hot cut to Verizon-North
Other Workgroups
RCCC
Hot cut is performed on DD
(F) From Page 3
Verizon-North updates 911 database
(D) From Page 3
Verizon-North resolves issue.
Yes
Is Verizon-North source of problem?
No
Verizon-North contacts MCI to investigate the problem.
(C) To Page 3)
Verizon-North 911 database


MCI
NPAC
MCI receives FOC with circuit ID and due date (DD) confirmed by Verizon-North
MCI updates internal database with new circuit information
MCI Circuit Inventory Database
MCI issues internal work order to activate its switch with the TN and features
MCI network technicians activate the TN and features in the switch
(B) From page 1
Assign a technician to coordinate and monitor hot cut
Verizon-North coordinates hot cut with MCI on DD
MCI sends transaction to NPAC to port TN on DD
MCI sends confirmation to Verizon-North that hot cut is complete
Billing Activities
Maintenance and Repair Activities
Service activated
MCI CSR database
Yes
Is MCI satisfied with hot cut results?
MCI receives SOC from Verizon-North
MCI updates data on CSR
No
Verisign uses MCI data to update LIDB database, MCI also updates CNAM database
LIDB/CNAM Databases
(D) to Page 2
MCI contacts Verizon-North to investigate problem
No
Is MCI source of problem?
MCI sends transaction to Intrado with customer 911 information
Intrado sends transaction to Verizon to update 911 SSP database
Yes
(C) From Page 2
MCI verifies/ resolves issues on its end.
(F) to Page 2
MCI sends NPAC transaction confirming hot cut and number porting
(E) From Page 1
NPAC ports TN on DD
NPAC updates LNP SMS
NPAC provides final updates to LNP SMS
NPAC updates LNP LSMS
NPAC broadcasts new LNP information to carriers

Assumptions:

1) All customers migrating to MCI call into an MCI service center to order service.
2) All customers port their numbers.
3) MCI switches provide all MCI UNE-L customer features.
4) Customers are not moving to new locations.
5) Verizon is the 911 SSP. Verizon maintains the 911 database and the tandem router from the Verizon Central Office to the PSAP. MCI uses a vendor, Intrado, to load 911 changes to the PSAP. MCI takes appropriate action to account for regional or local 911 requirements.
6) MCI will maintain its own LIDB and CNAM databases. MCI uses a vendor, Verisign, to manage LIDB changes.
7) Scenarios are represented as "ideal" (not necessarily zero-defect): Each party has sufficient resources; each party sufficiently manages its responsibilities; no "one-off" circumstances are involved.
8) When translations are performed, Verizon sets the AIN trigger.
9) As part of MCI's agreement with Verizon, line loss reports will only be generated for loss of lines to other carriers. If MCI is converting customers from one UNE type to another, line loss reports will not be generated.
10) Only processes and systems that directly impact MCI or Verizon are outlined.
11) For migrations involving DSL, voice and data are pre-wired together in MCI's collocation (DSLAM and Splitter), and inventoried and assigned as one assembly with one CFA.
12) It is assumed that UNE-L to UNE-P conversions or migrations require a two-order transaction (disconnect UNE-L and install UNE-P).

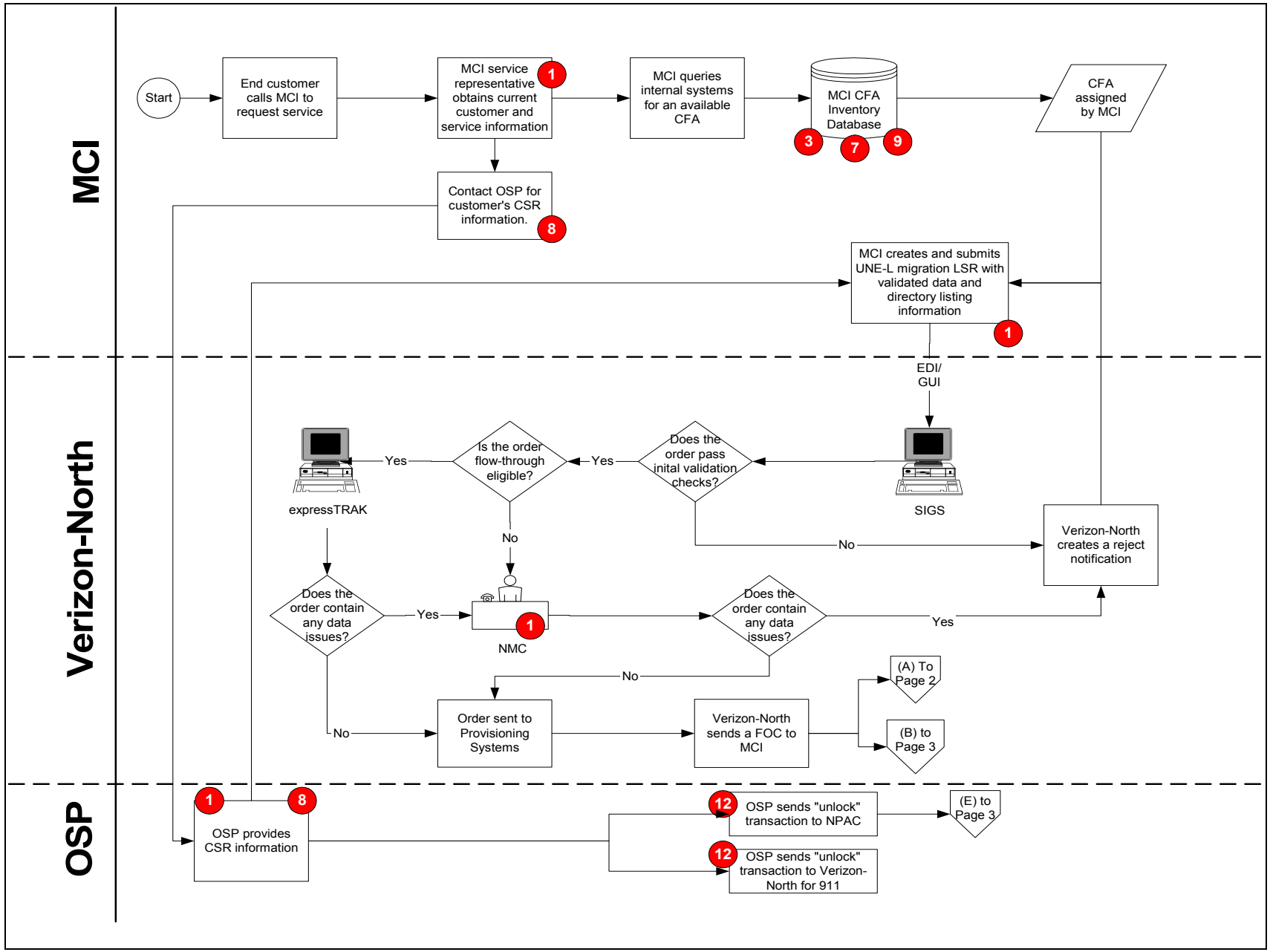
Challenges:

(The following challenges are based on the UNE-L Operational Analysis: Activity Two reports.)

1) Challenges associated with manual handling throughout ordering and provisioning processes.
2) Challenges associated with high steady-state provisioning volumes and the impact on systems and processes.
3) Challenges associated with facility availability.
4) Challenges associated with facility re-use.
5) Challenges associated with expanded MCI Provisioning Group responsibilities for UNE-L service.
6) Challenges associated with ordering and provisioning when IDLC service is present.
7) Challenges associated with data management specifically related to facility assignment and inventory.
8) Challenges associated with insufficient CLEC-to-CLEC interfaces and processes.
9) Challenges associated with data integrity.
10) Challenges associated with MCI LIDB/CNAM data management responsibilities.
11) Challenges associated with batch migration of customers from UNE-P to UNE-L service.
12) Challenges associated with number unlocking procedures for 911 and LNP.

Glossary:

APC: Assignment Provisioning Center provisioning system
BOSS: Business Office Support System
CFA: Connecting Facility Assignment
CNAM: Customer Name Database
DD: Due date
expressTRAK: Verizon order-processing system
FMC: Facilities Maintenance Center
FOC: Firm Order Confirmation
LIDB: Line Information Database
LFACS: Loop Facility Assignment and Control System
LiveWire: Verizon pre-order system
LNP: Line Number Portability
LSMS: Verizon's LNP database, containing downloads from NPAC's LSMS
LSR: Local Service Request
MARCH: Memory Administration Recent Change History
MLAC: Mechanized Loop Assignment Center
NAC: Network Administration Center
NMC: National Marketing Center
NPAC: Number Portability Administration Center: Manages the LPN process
OSP: Old Service Provider, also known as the "Losing CLEC"
OSPE: Outside Plant Engineering provisioning system
PARIS: Verizon provisioning/translation system
PAWS: Provisioning Analyst Workstation System provisioning system
PO: Pre-order
PSAP: Public Service Answering Point that receives and dispatches 911 calls
RCCC: Regional CLEC Coordination Center
RCMAC: Verizon provisioning/translation manual handling group
"Reverse" Hot Cut: Hot cut performed when ILEC "wins back" customer from CLEC, and reinstates retail service.
SIGS: Secure Integrated Gateway Systems
SMS: Service Management System: NPAC's system containing routing and LNP information
SOAC: Service Order Analysis and Control System
SOC: Service Order Confirmation
SSP: 911 Service Provider
SWITCH/FOMS: Frame Operations Management System
TIRKS: Trunk Information Record Keeping System
TRACKER: Verizon provisioning/translation system


MCI
Verizon-North
OSP
Start
End customer calls MCI to request service
MCI service representative obtains current customer and service information
1
MCI queries internal systems for an available CFA
MCI CFA Inventory Database
3
7
9
CFA assigned by MCI
Contact OSP for customer's CSR information.
8
MCI creates and submits UNE-L migration LSR with validated data and directory listing information
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EDI/ GUI
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Does the order pass inital validation checks?
Yes
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Verizon-North creates a reject notification
No
Does the order contain any data issues?
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Does the order contain any data issues?
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(A) To Page 2
(B) to Page 3
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Order sent to Provisioning Systems
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8
OSP provides CSR information
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OSP sends "unlock" transaction to NPAC
(E) to Page 3
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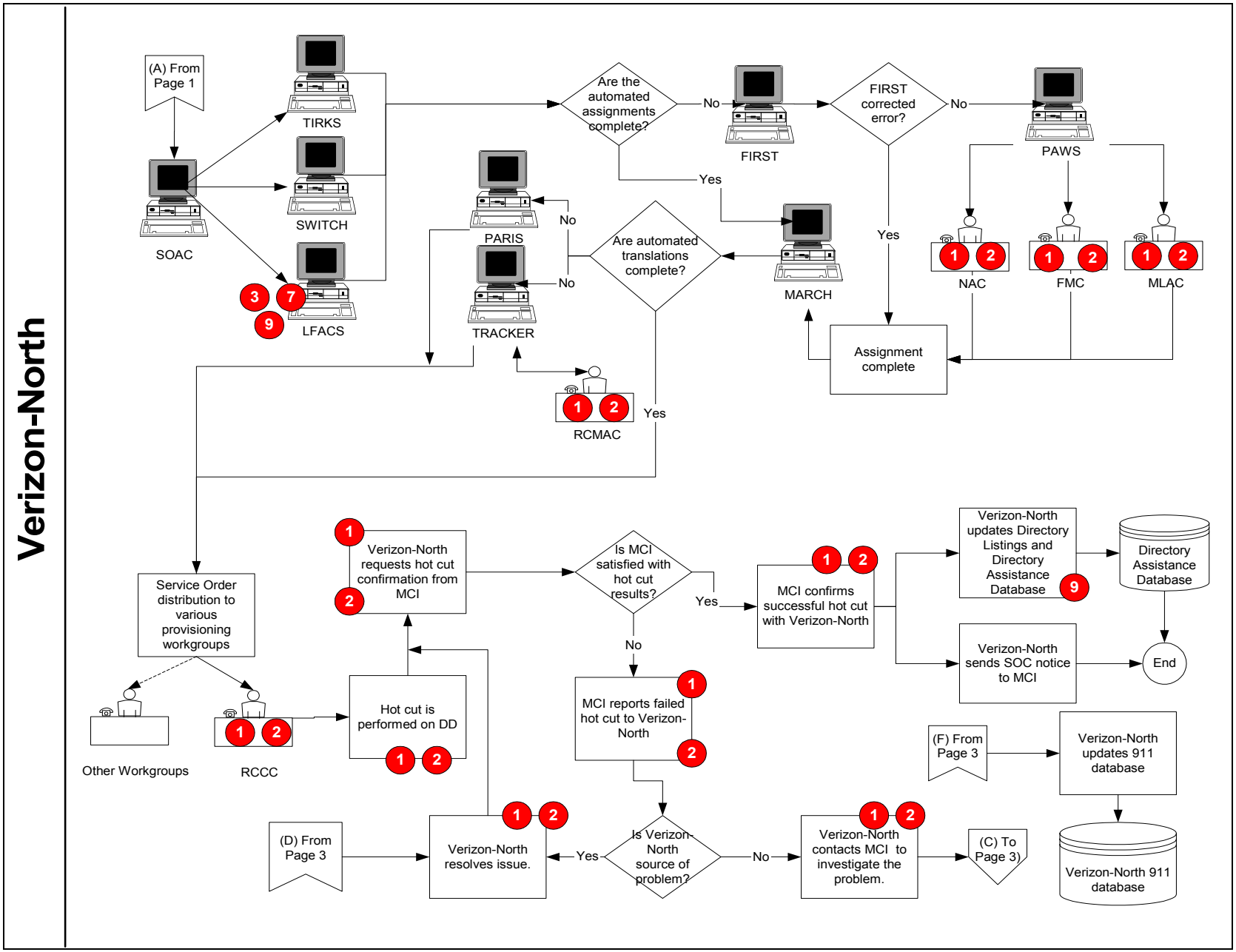
OSP sends "unlock" transaction to Verizon-North for 911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(D) From Page 3
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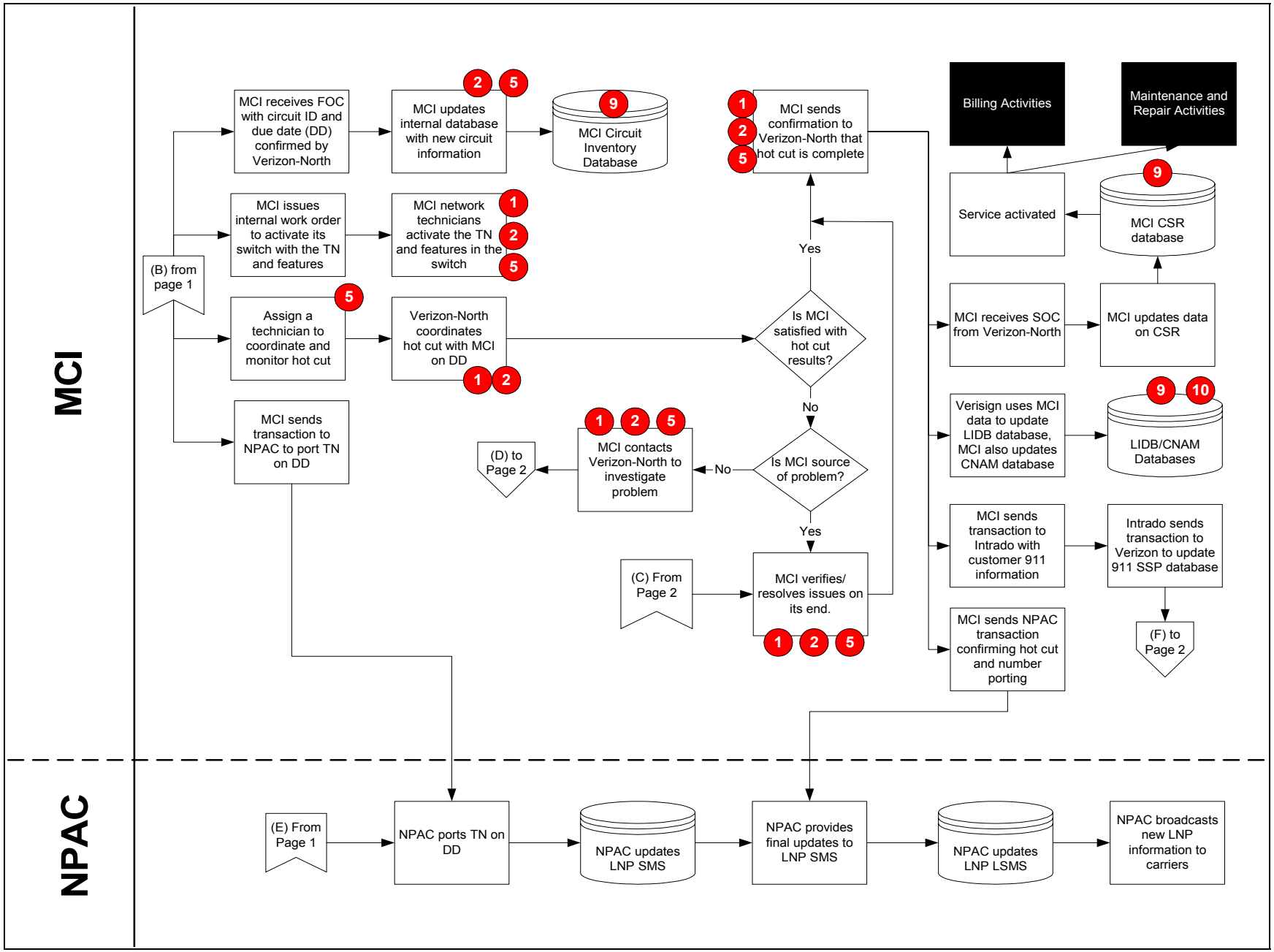
(C) To Page 3)
Verizon-North 911 database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7) Scenarios are represented as "ideal" (not necessarily zero-defect): Each party has sufficient resources; each party sufficiently manages its responsibilities; no "one-off" circumstances are involved.
8) When translations are performed, Verizon sets the AIN trigger.
9) As part of MCI's agreement with Verizon, line loss reports will only be generated for loss of lines to other carriers. If MCI is converting customers from one UNE type to another, line loss reports will not be generated.
10) Only processes and systems that directly impact MCI or Verizon are outlined.
11) For migrations involving DSL, voice and data are pre-wired together in MCI's collocation (DSLAM and Splitter), and inventoried and assigned as one assembly with one CFA.
12) It is assumed that UNE-L to UNE-P conversions or migrations require a two-order transaction (disconnect UNE-L and install UNE-P).

Challenges:

(The following challenges are based on the UNE-L Operational Analysis: Activity Two reports.)

1) Challenges associated with manual handling throughout ordering and provisioning processes.
2) Challenges associated with high steady-state provisioning volumes and the impact on systems and processes.
3) Challenges associated with facility availability.
4) Challenges associated with facility re-use.
5) Challenges associated with expanded MCI Provisioning Group responsibilities for UNE-L service.
6) Challenges associated with ordering and provisioning when IDLC service is present.
7) Challenges associated with data management specifically related to facility assignment and inventory.
8) Challenges associated with insufficient CLEC-to-CLEC interfaces and processes.
9) Challenges associated with data integrity.
10) Challenges associated with MCI LIDB/CNAM data management responsibilities.
11) Challenges associated with batch migration of customers from UNE-P to UNE-L service.
12) Challenges associated with number unlocking procedures for 911 and LNP.

Glossary:

APC: Assignment Provisioning Center provisioning system
BOSS: Business Office Support System
CFA: Connecting Facility Assignment
CNAM: Customer Name Database
DD: Due date
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FMC: Facilities Maintenance Center
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NPAC: Number Portability Administration Center: Manages the LPN process
OSP: Old Service Provider, also known as the "Losing CLEC"
OSPE: Outside Plant Engineering provisioning system
PARIS: Verizon provisioning/translation system
PAWS: Provisioning Analyst Workstation System provisioning system
PO: Pre-order
PSAP: Public Service Answering Point that receives and dispatches 911 calls
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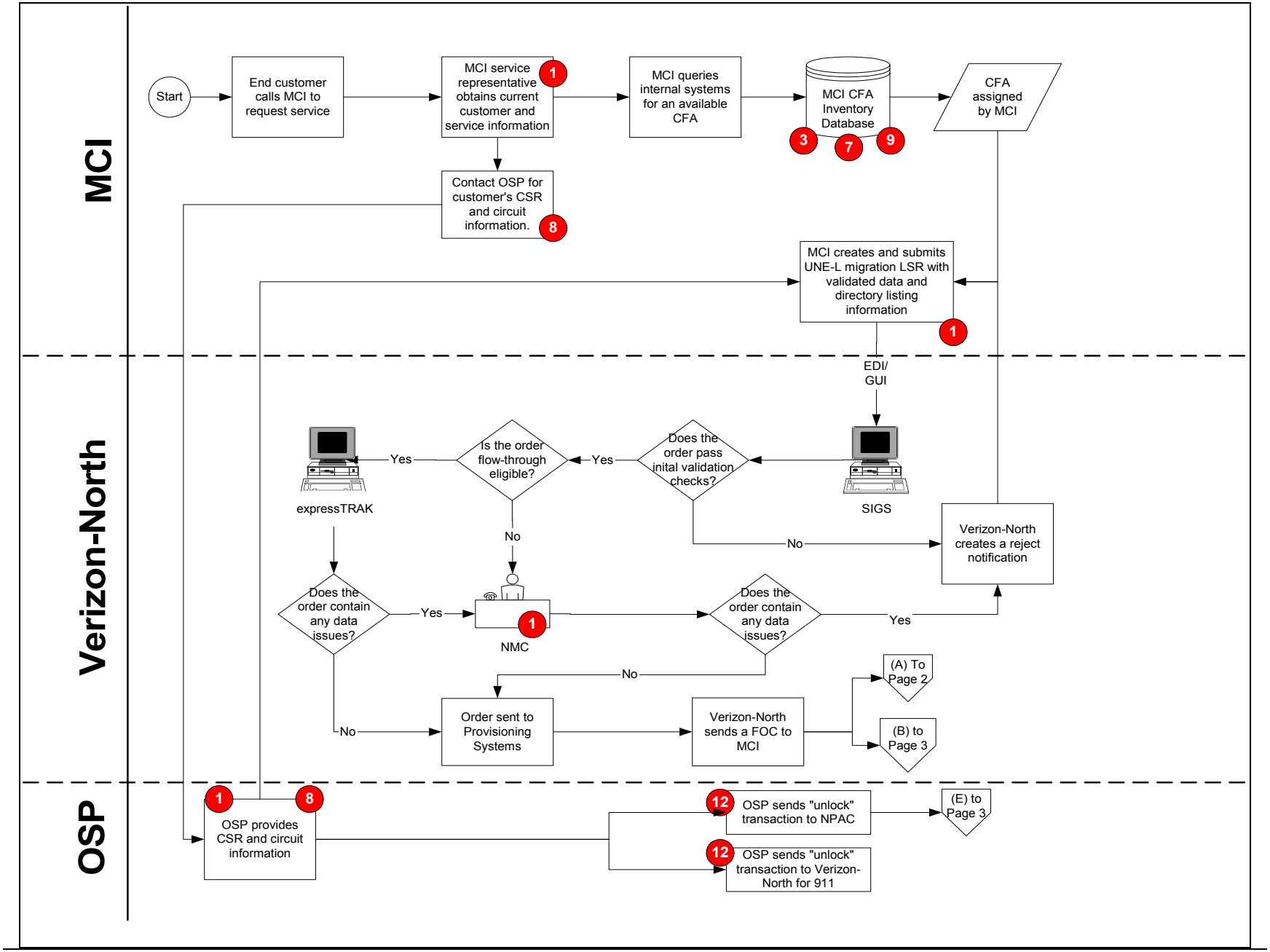
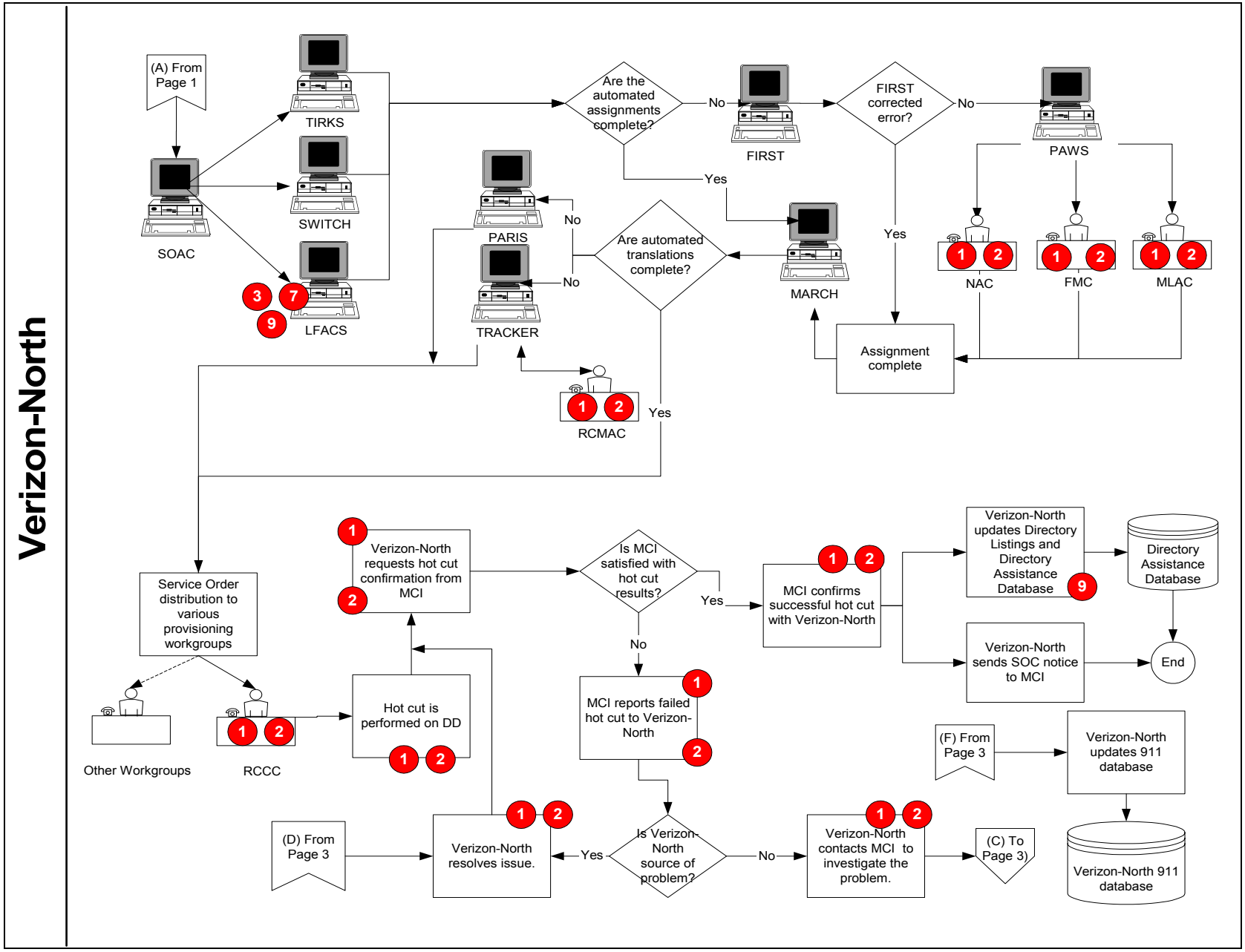
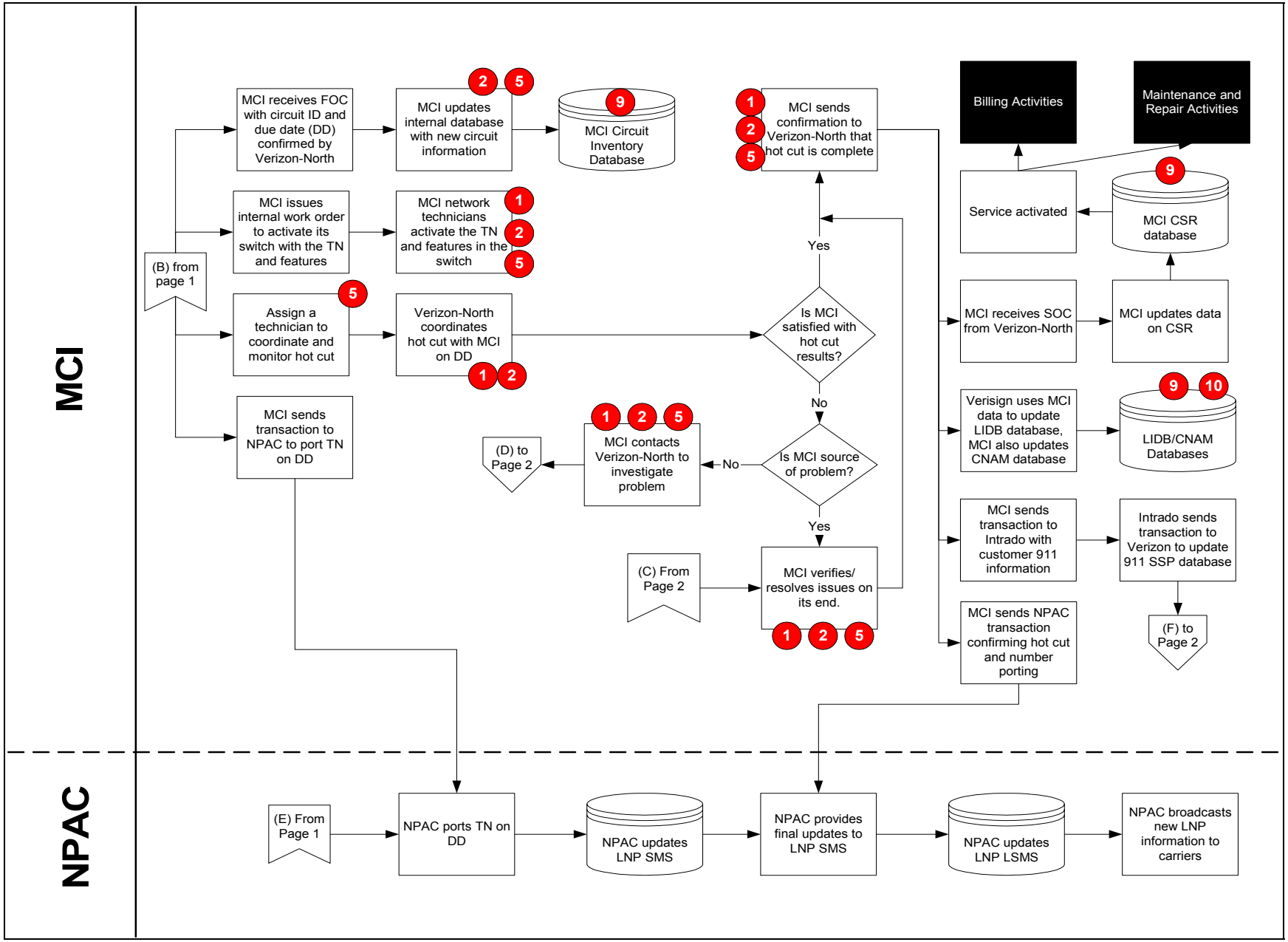
TIRKS: Trunk Information Record Keeping System
TRACKER: Verizon provisioning/translation system


MCI
Verizon-North
OSP
Start
End customer calls MCI to request service
MCI service representative obtains current customer and service information
1
MCI queries internal systems for an available CFA
MCI CFA Inventory Database
3
7
9
CFA assigned by MCI
Contact OSP for customer's CSR and circuit information.
8
MCI creates and submits UNE-L migration LSR with validated data and directory listing information
1
EDI/ GUI
SIGS
Does the order pass inital validation checks?
Yes
Is the order flow-through eligible?
Yes
expressTRAK
No
Verizon-North creates a reject notification
No
Does the order contain any data issues?
Yes
NMC
1
Does the order contain any data issues?
Yes
No
No
Order sent to Provisioning Systems
Verizon-North sends a FOC to MCI
(A) To Page 2
(B) to Page 3
1
OSP provides CSR and circuit information
8
12
OSP sends "unlock" transaction to NPAC
(E) to Page 3
12
OSP sends "unlock" transaction to Verizon-North for 911


Verizon-North
(A) From Page 1
TIRKS
SWITCH
SOAC
LFACS
3
7
9
Are the automated assignments complete?
No
FIRST
Yes
FIRST corrected error?
No
PAWS
Yes
PARIS
No
Are automated translations complete?
No
TRACKER
MARCH
NAC
FMC
MLAC
1
2
Assignment complete
RCMAC
Yes
Service Order distribution to various provisioning workgroups
Other Workgroups
RCCC
Hot cut is performed on DD
Verizon-North requests hot cut confirmation from MCI
Is MCI satisfied with hot cut results?
Yes
No
MCI confirms successful hot cut with Verizon-North
Verizon-North updates Directory Listings and Directory Assistance Database
9
Directory Assistance Database
Verizon-North sends SOC notice to MCI
End
MCI reports failed hot cut to Verizon-North
(F) From Page 3
Verizon-North updates 911 database
Verizon-North 911 database
(D) From Page 3
Verizon-North resolves issue.
Yes
Is Verizon-North source of problem?
No
Verizon-North contacts MCI to investigate the problem.
(C) To Page 3)


MCI
NPAC
MCI receives FOC with circuit ID and due date (DD) confirmed by Verizon-North
MCI updates internal database with new circuit information
MCI Circuit Inventory Database
MCI issues internal work order to activate its switch with the TN and features
MCI network technicians activate the TN and features in the switch
(B) from page 1
Assign a technician to coordinate and monitor hot cut
Verizon-North coordinates hot cut with MCI on DD
MCI sends transaction to NPAC to port TN on DD
MCI sends confirmation to Verizon-North that hot cut is complete
Yes
Is MCI satisfied with hot cut results?
No
Is MCI source of problem?
No
MCI contacts Verizon-North to investigate problem
(D) to Page 2
Yes
(C) From Page 2
MCI verifies/ resolves issues on its end.
Billing Activities
Maintenance and Repair Activities
Service activated
MCI CSR database
MCI receives SOC from Verizon-North
MCI updates data on CSR
Verisign uses MCI data to update LIDB database, MCI also updates CNAM database
LIDB/CNAM Databases
MCI sends transaction to Intrado with customer 911 information
Intrado sends transaction to Verizon to update 911 SSP database
(F) to Page 2
MCI sends NPAC transaction confirming hot cut and number porting
(E) From Page 1
NPAC ports TN on DD
NPAC updates LNP SMS
NPAC provides final updates to LNP SMS
NPAC updates LNP LSMS
NPAC broadcasts new LNP information to carriers

Assumptions:

1) All customers migrating to MCI call into an MCI service center to order service.
2) All customers port their numbers.
3) MCI switches provide all MCI UNE-L customer features.
4) Customers are not moving to new locations.
5) Verizon is the 911 SSP. Verizon maintains the 911 database and the tandem router from the Verizon Central Office to the PSAP. MCI uses a vendor, Intrado, to load 911 changes to the PSAP. MCI takes appropriate action to account for regional or local 911 requirements.
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Challenges:

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8) Challenges associated with insufficient CLEC-to-CLEC interfaces and processes.
9) Challenges associated with data integrity.
10) Challenges associated with MCI LIDB/CNAM data management responsibilities.
11) Challenges associated with batch migration of customers from UNE-P to UNE-L service.
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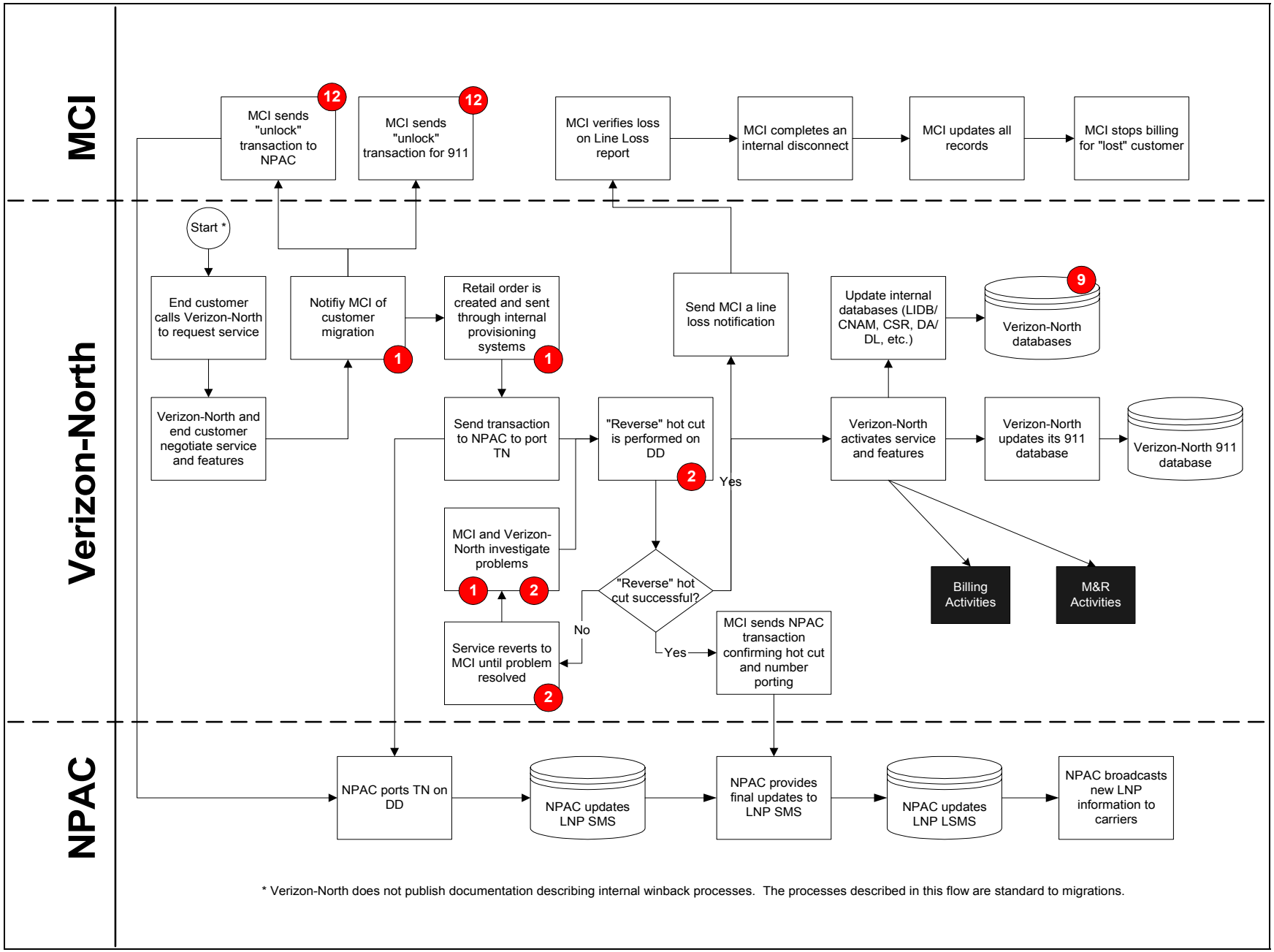
Winback - MCI UNE-L to Verizon Retail Migration



* Verizon-North does not publish documentation describing internal winback processes. The processes described in this flow are standard to migrations.

Assumptions:

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10) Challenges associated with MCI LIDB/CNAM data management responsibilities.
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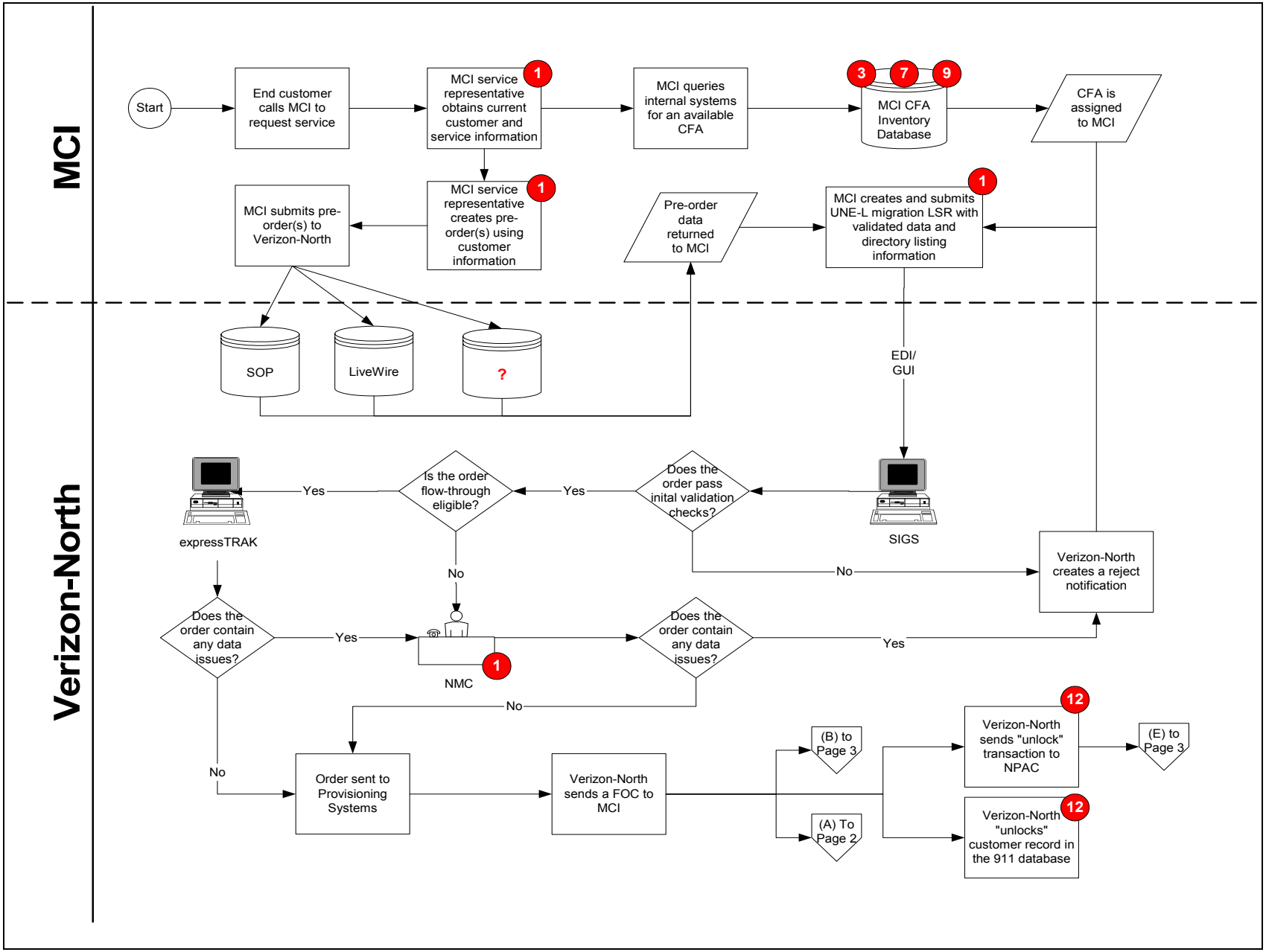
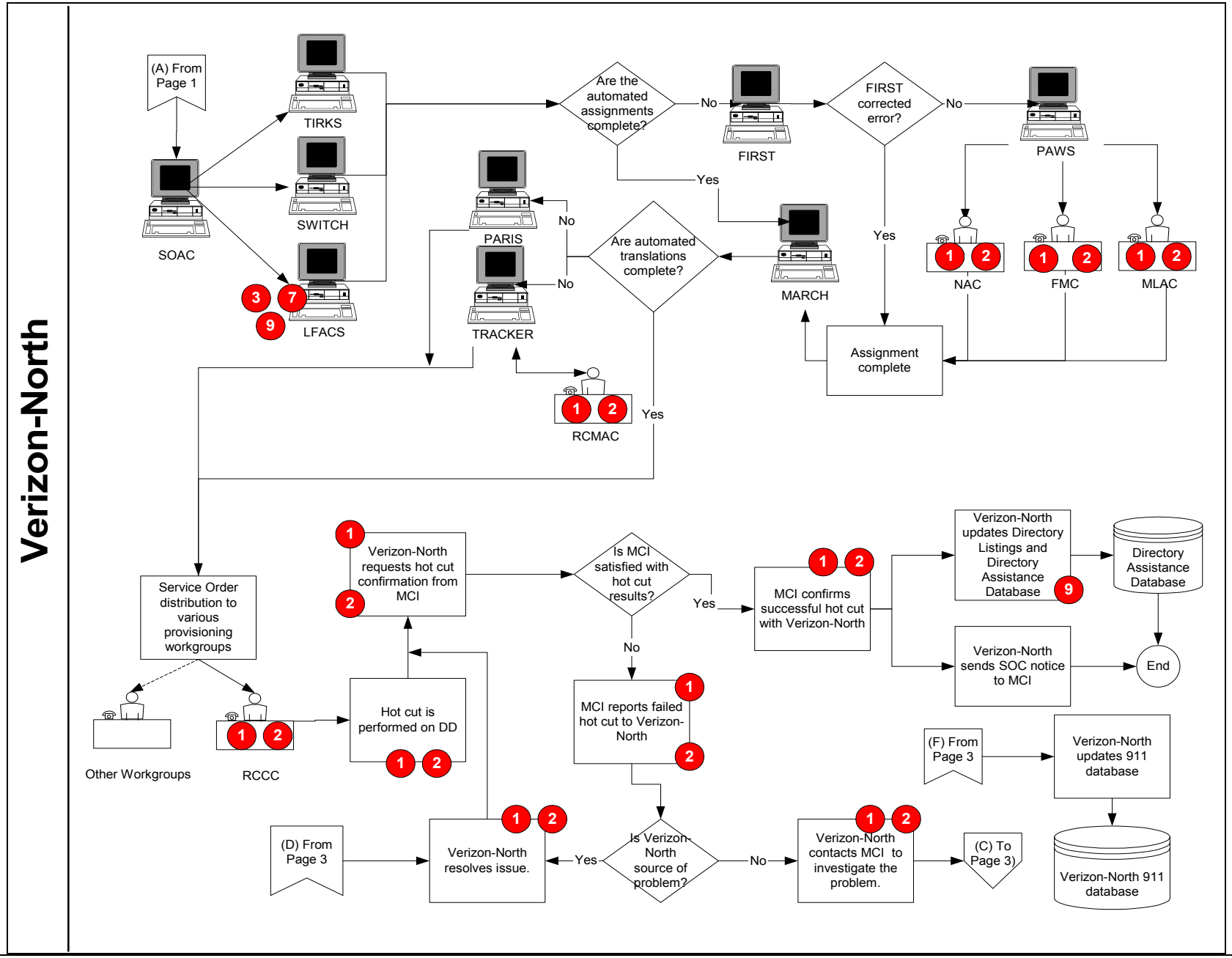
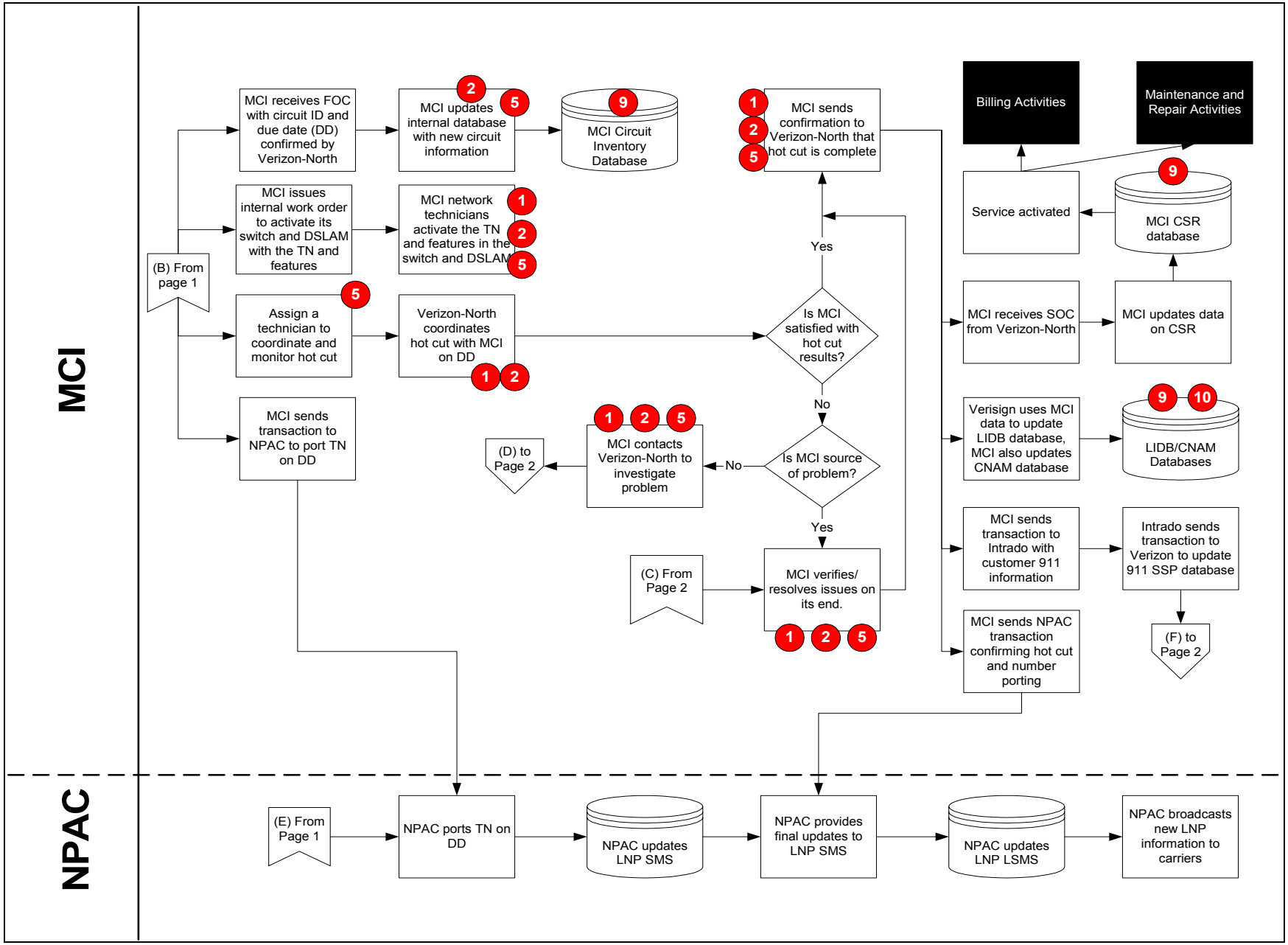

MCI
Verizon-North
Start
End customer calls MCI to request service
MCI service representative obtains current customer and service information
1
MCI queries internal systems for an available CFA
3
7
9
MCI CFA Inventory Database
CFA is assigned to MCI
MCI submits pre-order(s) to Verizon-North
MCI service representative creates pre-order(s) using customer information
1
Pre-order data returned to MCI
MCI creates and submits UNE-L migration LSR with validated data and directory listing information
1
SOP
LiveWire
?
EDI/ GUI
expressTRAK
Yes
Is the order flow-through eligible?
Yes
Does the order pass inital validation checks?
SIGS
No
Verizon-North creates a reject notification
Does the order contain any data issues?
Yes
NMC
1
No
Does the order contain any data issues?
Yes
No
Order sent to Provisioning Systems
Verizon-North sends a FOC to MCI
(B) to Page 3
(A) To Page 2
12
Verizon-North sends "unlock" transaction to NPAC
(E) to Page 3
12
Verizon-North "unlocks" customer record in the 911 database


Verizon-North
(A) From Page 1
TIRKS
SWITCH
SOAC
LFACS
Are the automated assignments complete?
No
FIRST
FIRST corrected error?
No
PAWS
Yes
PARIS
No
Are automated translations complete?
No
TRACKER
MARCH
Yes
NAC
FMC
MLAC
Assignment complete
RCMAC
Yes
Service Order distribution to various provisioning workgroups
Verizon-North requests hot cut confirmation from MCI
Is MCI satisfied with hot cut results?
Yes
MCI confirms successful hot cut with Verizon-North
Verizon-North updates Directory Listings and Directory Assistance Database
Directory Assistance Database
Verizon-North sends SOC notice to MCI
End
No
MCI reports failed hot cut to Verizon-North
Other Workgroups
RCCC
Hot cut is performed on DD
(F) From Page 3
Verizon-North updates 911 database
(D) From Page 3
Verizon-North resolves issue.
Yes
Is Verizon-North source of problem?
No
Verizon-North contacts MCI to investigate the problem.
(C) To Page 3)
Verizon-North 911 database


MCI
NPAC
MCI receives FOC with circuit ID and due date (DD) confirmed by Verizon-North
MCI updates internal database with new circuit information
MCI Circuit Inventory Database
MCI issues internal work order to activate its switch and DSLAM with the TN and features
MCI network technicians activate the TN and features in the switch and DSLAM
(B) From page 1
Assign a technician to coordinate and monitor hot cut
Verizon-North coordinates hot cut with MCI on DD
MCI sends transaction to NPAC to port TN on DD
MCI sends confirmation to Verizon-North that hot cut is complete
Billing Activities
Maintenance and Repair Activities
Service activated
MCI CSR database
Yes
Is MCI satisfied with hot cut results?
MCI receives SOC from Verizon-North
MCI updates data on CSR
No
Verisign uses MCI data to update LIDB database, MCI also updates CNAM database
LIDB/CNAM Databases
(D) to Page 2
MCI contacts Verizon-North to investigate problem
No
Is MCI source of problem?
MCI sends transaction to Intrado with customer 911 information
Intrado sends transaction to Verizon to update 911 SSP database
(C) From Page 2
MCI verifies/ resolves issues on its end.
Yes
MCI sends NPAC transaction confirming hot cut and number porting
(F) to Page 2
(E) From Page 1
NPAC ports TN on DD
NPAC updates LNP SMS
NPAC provides final updates to LNP SMS
NPAC updates LNP LSMS
NPAC broadcasts new LNP information to carriers

Assumptions:

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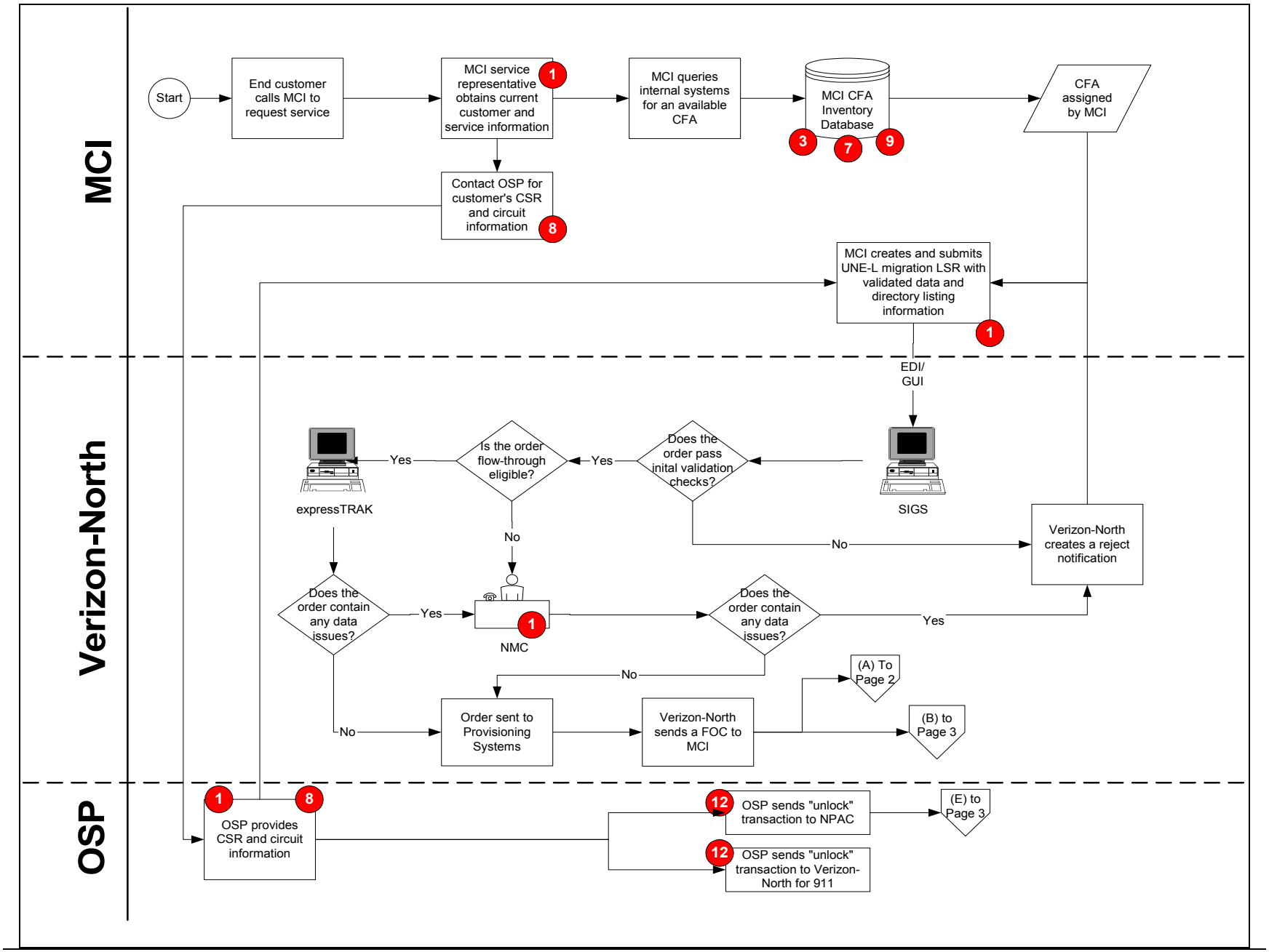
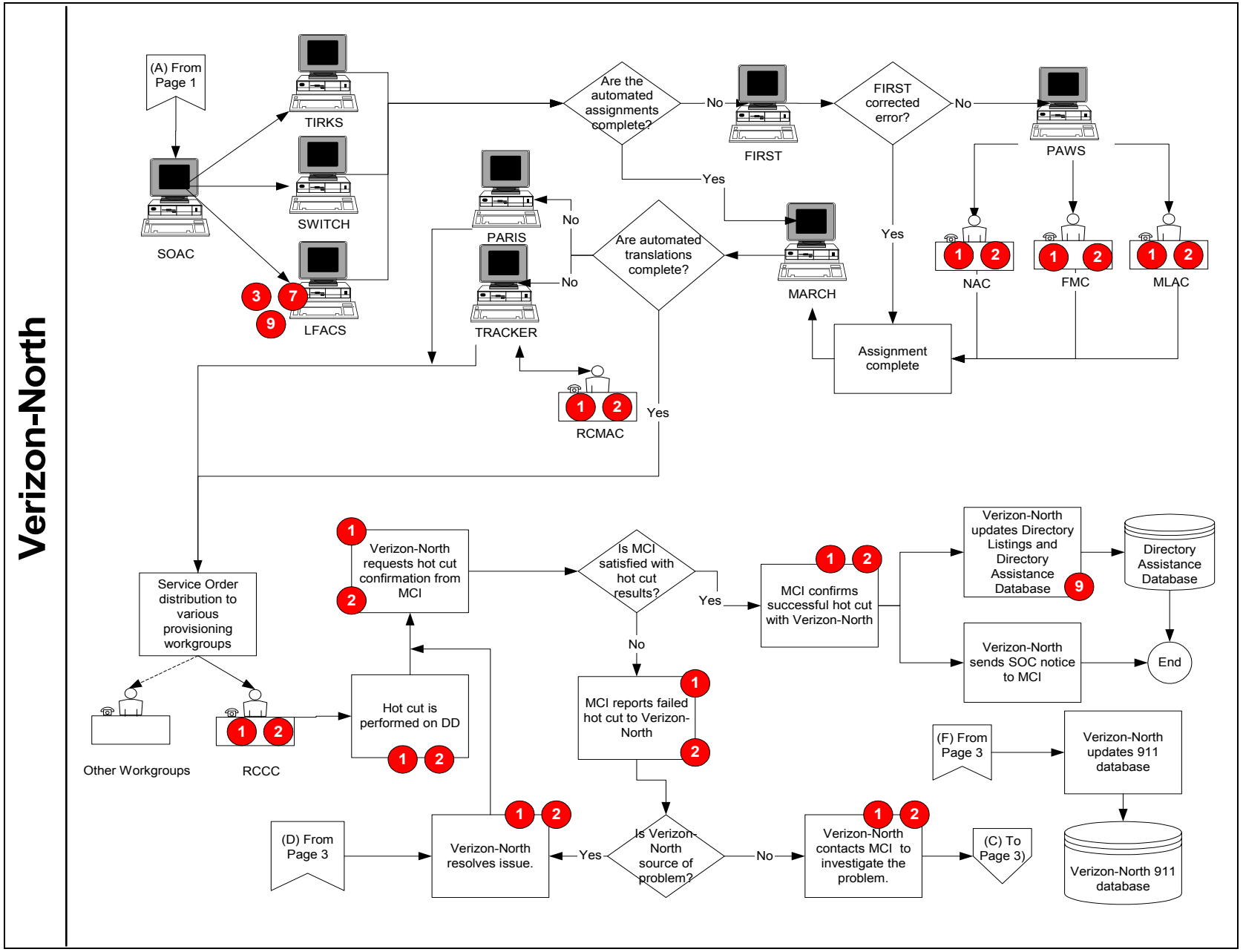

MCI
Verizon-North
OSP
Start
End customer calls MCI to request service
MCI service representative obtains current customer and service information
1
MCI queries internal systems for an available CFA
MCI CFA Inventory Database
3
7
9
CFA assigned by MCI
Contact OSP for customer's CSR and circuit information
8
MCI creates and submits UNE-L migration LSR with validated data and directory listing information
1
EDI/ GUI
SIGS
Does the order pass inital validation checks?
Yes
Is the order flow-through eligible?
Yes
expressTRAK
No
Verizon-North creates a reject notification
Does the order contain any data issues?
Yes
1
NMC
Does the order contain any data issues?
Yes
No
(A) To Page 2
No
Order sent to Provisioning Systems
Verizon-North sends a FOC to MCI
(B) to Page 3
1
8
OSP provides CSR and circuit information
12
OSP sends "unlock" transaction to NPAC
(E) to Page 3
12
OSP sends "unlock" transaction to Verizon-North for 911


Verizon-North
(A) From Page 1
TIRKS
SWITCH
SOAC
LFACS
Are the automated assignments complete?
No
FIRST
FIRST corrected error?
No
PAWS
Yes
PARIS
No
Are automated translations complete?
No
TRACKER
MARCH
Yes
NAC
FMC
MLAC
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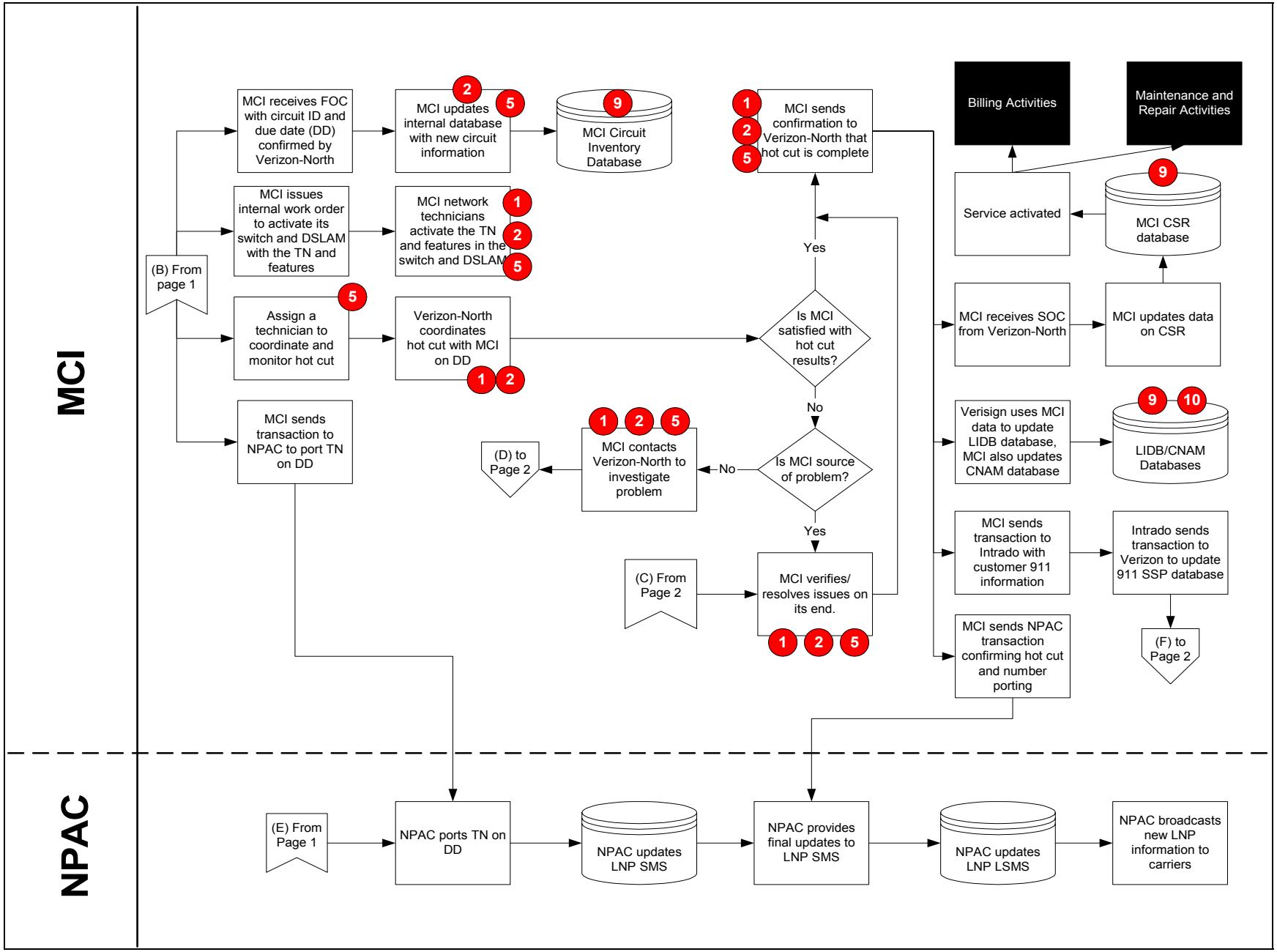
Directory Assistance Database
Verizon-North sends SOC notice to MCI
End
No
MCI reports failed hot cut to Verizon-North
Other Workgroups
RCCC
Hot cut is performed on DD
(F) From Page 3
Verizon-North updates 911 database
(D) From Page 3
Verizon-North resolves issue.
Yes
Is Verizon-North source of problem?
No
Verizon-North contacts MCI to investigate the problem.
(C) To Page 3)
Verizon-North 911 database


MCI
NPAC
MCI receives FOC with circuit ID and due date (DD) confirmed by Verizon-North
MCI updates internal database with new circuit information
MCI Circuit Inventory Database
MCI issues internal work order to activate its switch and DSLAM with the TN and features
MCI network technicians activate the TN and features in the switch and DSLAM
(B) From page 1
Assign a technician to coordinate and monitor hot cut
Verizon-North coordinates hot cut with MCI on DD
MCI sends transaction to NPAC to port TN on DD
MCI sends confirmation to Verizon-North that hot cut is complete
Billing Activities
Maintenance and Repair Activities
Service activated
MCI CSR database
Yes
Is MCI satisfied with hot cut results?
MCI receives SOC from Verizon-North
MCI updates data on CSR
No
Is MCI source of problem?
No
MCI contacts Verizon-North to investigate problem
(D) to Page 2
Verisign uses MCI data to update LIDB database, MCI also updates CNAM database
LIDB/CNAM Databases
Yes
(C) From Page 2
MCI verifies/ resolves issues on its end.
MCI sends transaction to Intrado with customer 911 information
Intrado sends transaction to Verizon to update 911 SSP database
(F) to Page 2
MCI sends NPAC transaction confirming hot cut and number porting
(E) From Page 1
NPAC ports TN on DD
NPAC updates LNP SMS
NPAC provides final updates to LNP SMS
NPAC updates LNP LSMS
NPAC broadcasts new LNP information to carriers

Assumptions:

1) All customers migrating to MCI call into an MCI service center to order service.
2) All customers port their numbers.
3) MCI switches provide all MCI UNE-L customer features.
4) Customers are not moving to new locations.
5) Verizon is the 911 SSP. Verizon maintains the 911 database and the tandem router from the Verizon Central Office to the PSAP. MCI uses a vendor, Intrado, to load 911 changes to the PSAP. MCI takes appropriate action to account for regional or local 911 requirements.
6) MCI will maintain its own LIDB and CNAM databases. MCI uses a vendor, Verisign, to manage LIDB changes.
7) Scenarios are represented as "ideal" (not necessarily zero-defect): Each party has sufficient resources; each party sufficiently manages its responsibilities; no "one-off" circumstances are involved.
8) When translations are performed, Verizon sets the AIN trigger.
9) As part of MCI's agreement with Verizon, line loss reports will only be generated for loss of lines to other carriers. If MCI is converting customers from one UNE type to another, line loss reports will not be generated.
10) Only processes and systems that directly impact MCI or Verizon are outlined.
11) For migrations involving DSL, voice and data are pre-wired together in MCI's collocation (DSLAM and Splitter), and inventoried and assigned as one assembly with one CFA.
12) It is assumed that UNE-L to UNE-P conversions or migrations require a two-order transaction (disconnect UNE-L and install UNE-P).

Challenges:

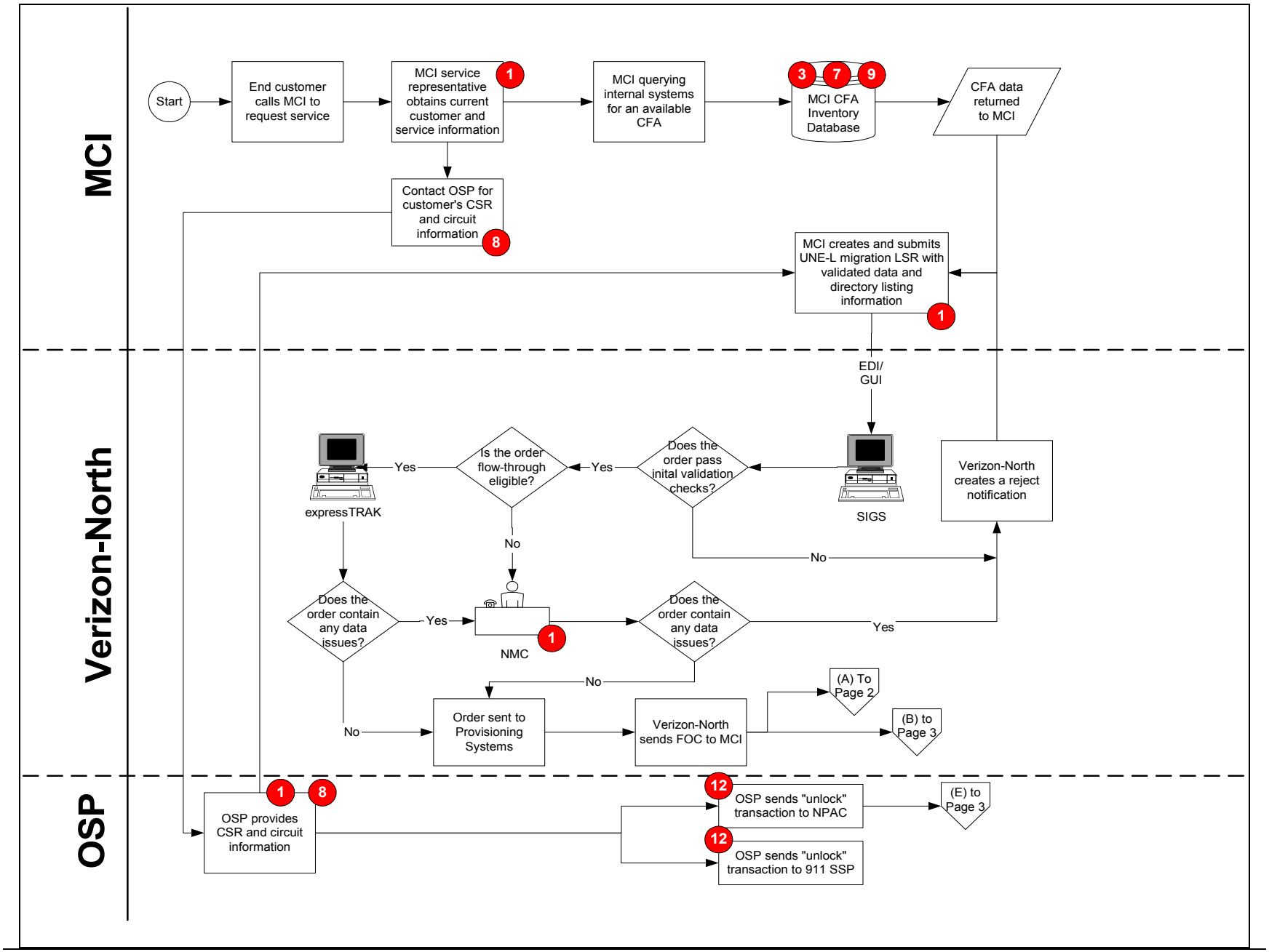
(The following challenges are based on the UNE-L Operational Analysis: Activity Two reports.)

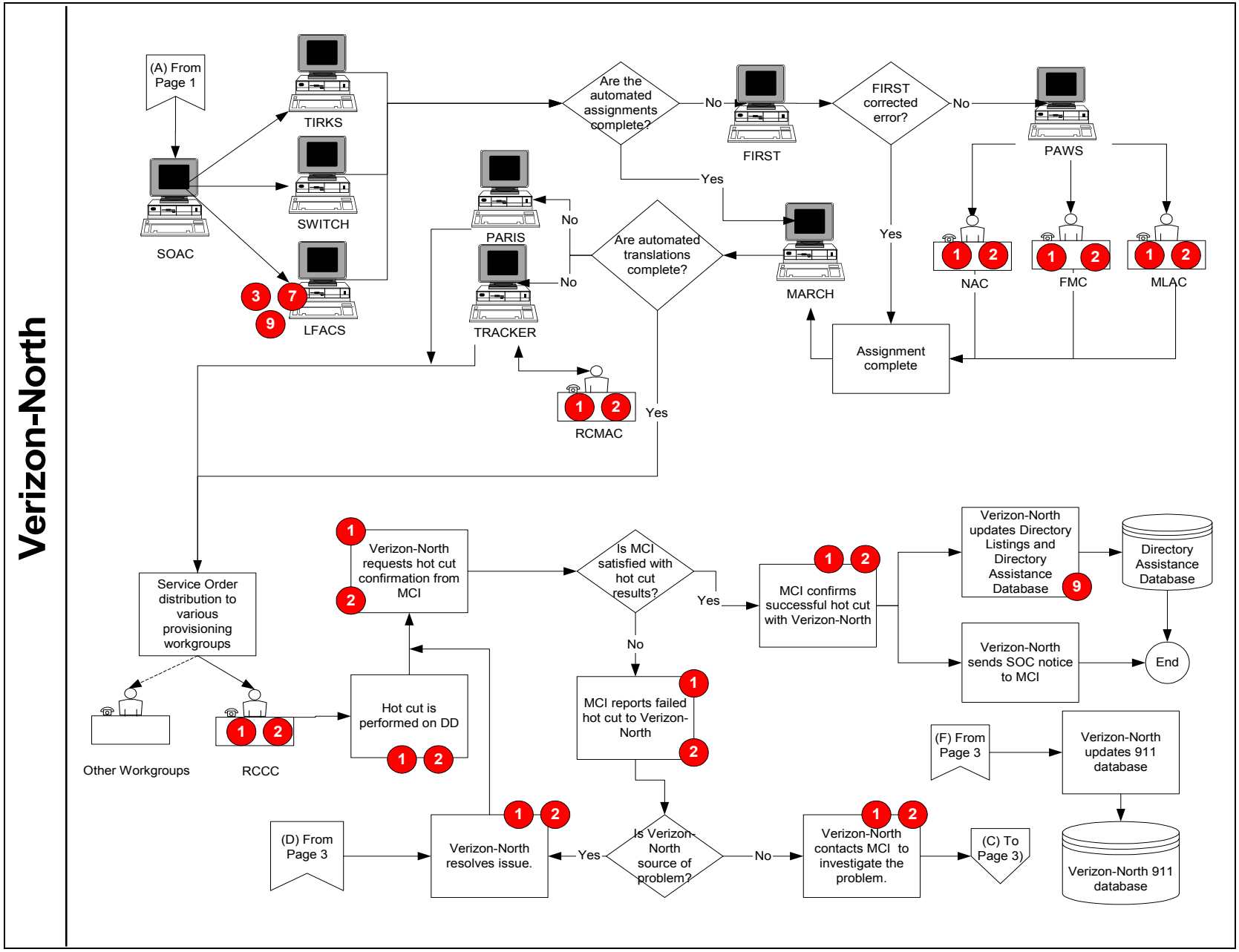
1) Challenges associated with manual handling throughout ordering and provisioning processes.
2) Challenges associated with high steady-state provisioning volumes and the impact on systems and processes.
3) Challenges associated with facility availability.
4) Challenges associated with facility re-use.
5) Challenges associated with expanded MCI Provisioning Group responsibilities for UNE-L service.
6) Challenges associated with ordering and provisioning when IDLC service is present.
7) Challenges associated with data management specifically related to facility assignment and inventory.
8) Challenges associated with insufficient CLEC-to-CLEC interfaces and processes.
9) Challenges associated with data integrity.
10) Challenges associated with MCI LIDB/CNAM data management responsibilities.
11) Challenges associated with batch migration of customers from UNE-P to UNE-L service.
12) Challenges associated with number unlocking procedures for 911 and LNP.

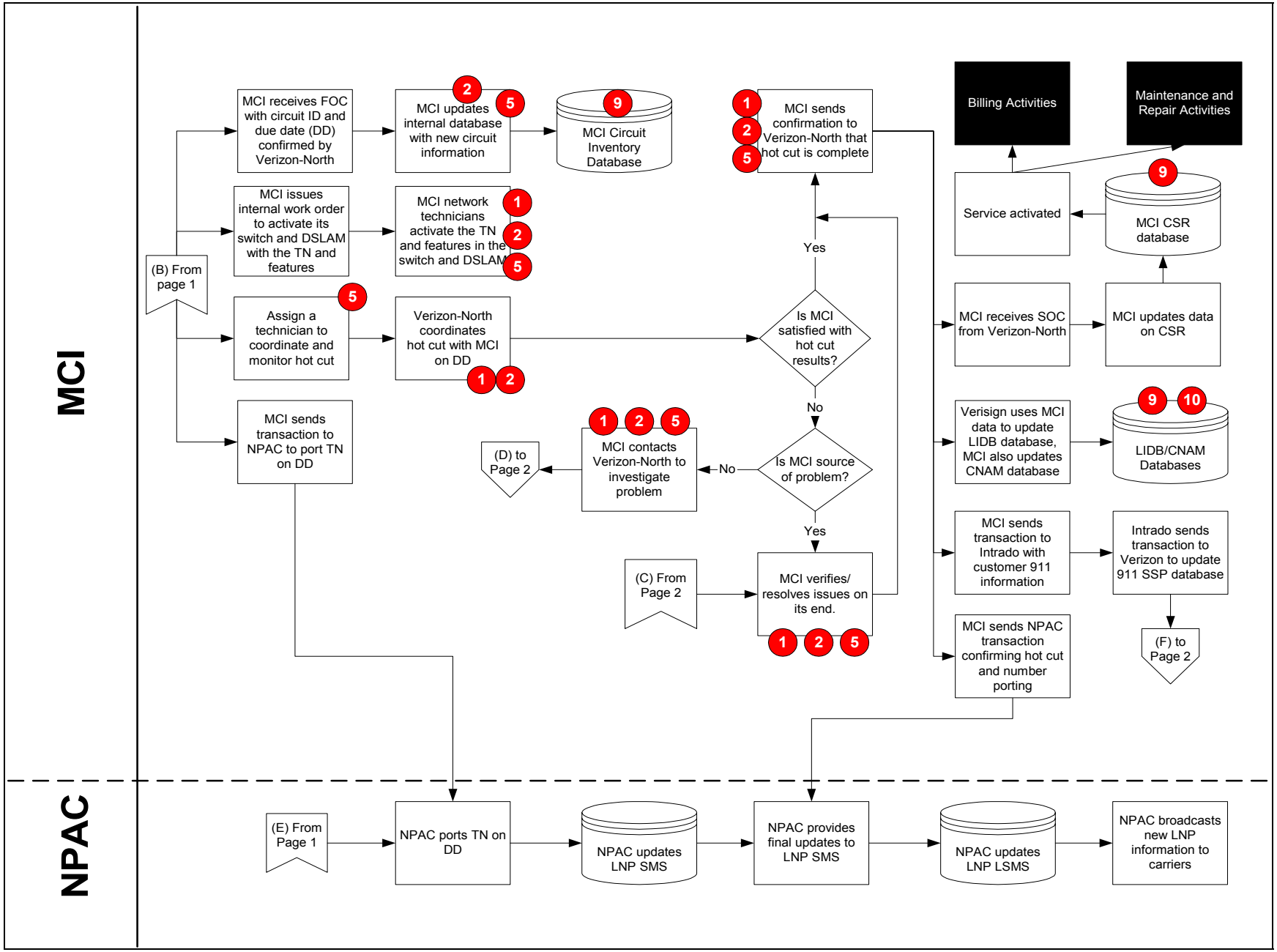
Glossary:

APC: Assignment Provisioning Center provisioning system
BOSS: Business Office Support System
CFA: Connecting Facility Assignment
CNAM: Customer Name Database
DD: Due date
expressTRAK: Verizon order-processing system
FMC: Facilities Maintenance Center
FOC: Firm Order Confirmation
LIDB: Line Information Database
LFACS: Loop Facility Assignment and Control System
LiveWire: Verizon pre-order system
LNP: Line Number Portability
LSMS: Verizon's LNP database, containing downloads from NPAC's LSMS
LSR: Local Service Request
MARCH: Memory Administration Recent Change History
MLAC: Mechanized Loop Assignment Center
NAC: Network Administration Center
NMC: National Marketing Center
NPAC: Number Portability Administration Center: Manages the LPN process
OSP: Old Service Provider, also known as the "Losing CLEC"
OSPE: Outside Plant Engineering provisioning system
PARIS: Verizon provisioning/translation system
PAWS: Provisioning Analyst Workstation System provisioning system
PO: Pre-order
PSAP: Public Service Answering Point that receives and dispatches 911 calls
RCCC: Regional CLEC Coordination Center
RCMAC: Verizon provisioning/translation manual handling group
"Reverse" Hot Cut: Hot cut performed when ILEC "wins back" customer from CLEC, and reinstates retail service.
SIGS: Secure Integrated Gateway Systems
SMS: Service Management System: NPAC's system containing routing and LNP information
SOAC: Service Order Analysis and Control System
SOC: Service Order Confirmation
SSP: 911 Service Provider
SWITCH/FOMS: Frame Operations Management System
TIRKS: Trunk Information Record Keeping System
TRACKER: Verizon provisioning/translation system

CLEC DSL-Capable Loop to MCI DSL-Capable Loop




Verizon-North
(A) From Page 1
TIRKS
SWITCH
SOAC
LFACS
Are the automated assignments complete?
No
FIRST
FIRST corrected error?
No
PAWS
Yes
PARIS
No
Are automated translations complete?
No
TRACKER
MARCH
Yes
NAC
FMC
MLAC
Assignment complete
RCMAC
Yes
Service Order distribution to various provisioning workgroups
Verizon-North requests hot cut confirmation from MCI
Is MCI satisfied with hot cut results?
Yes
MCI confirms successful hot cut with Verizon-North
Verizon-North updates Directory Listings and Directory Assistance Database
Directory Assistance Database
Verizon-North sends SOC notice to MCI
End
No
MCI reports failed hot cut to Verizon-North
Other Workgroups
RCCC
Hot cut is performed on DD
(F) From Page 3
Verizon-North updates 911 database
(D) From Page 3
Verizon-North resolves issue.
Yes
Is Verizon-North source of problem?
No
Verizon-North contacts MCI to investigate the problem.
(C) To Page 3)
Verizon-North 911 database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